

- # Board of Health Agenda

4. HEARING:

Tobacco Violations - Galaxy Market

5. HEARING:

Tobacco Violation - Arlington Convenience

6. UPDATES:

COVID-19 Situational Update

7. UPDATES:

Public Health Nurse Update

8. UPDATES:

Environmental Health

9. UPDATES:

Restaurants

PUBLIC COMMENT

Adjourn



## Town of Arlington, Massachusetts

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### Acceptance of Meeting Minutes from May 19, 2021

#### ATTACHMENTS:

	Type	File Name	Description
▣	Reference Material	05192021Board_of_Health_Minutes__(1).pdf	05192021 Minutes Board of Health



Town of Arlington  
Department of Health and Human Services  
Office of the Board of Health  
27 Maple Street  
Arlington, MA 02476

Tel: (781) 316-3170  
Fax: (781) 316-3175

## BOARD OF HEALTH MEETING MINUTES

Date: Wednesday, May 19, 2021

Time: 2:00pm

Location: Conducted by Remote Participation

In accordance with the Governor's [Order Suspending Certain Provisions of the Open Meeting Law, G. L. c. 30A, § 20](#) relating to the COVID-19 emergency, the May 19, 2021 public meeting of the Arlington Board of Health shall be physically closed to the public to avoid group congregation. The meeting shall instead be held virtually using Zoom.

***Public access to this meeting shall be provided in the following manner:***

Real-time public comment can be addressed to the Board of Health utilizing the Zoom virtual meeting software for remote participation. This application will allow attendees to request an opportunity for public comment, and allow the Board Chair to grant attendees the opportunity for public comment. Attendees can use either phone or computer to participate in the meeting. Public comment can also be sent in advance of the meeting by emailing the Board of Health at [boh@town.arlington.ma.us](mailto:boh@town.arlington.ma.us) by no later than 5pm on May 18, 2021. Submitted public comment will be read into the record at the appropriate points in the meeting.

***Zoom Login instructions:***

Instructions and the meeting link for this specific meeting can be found on the [Board's agenda and minutes page](#) or on the [Town's meeting calendar](#). The meeting registration information is listed below. When attendees enter the meeting, they will be placed into a virtual waiting room. Attendees will be admitted into the meeting from the waiting room at the start of the meeting.

Please register in advance for this meeting:

<https://town-arlington-ma-us.zoom.us/meeting/register/tJEucuiqpjotGtC0B-t9K1DEz2y1VVEtlynM>

After registering, you will receive a confirmation email containing information about joining the meeting.

**On this agenda:**

1. Administrative

Lead Health Compliance Officer Pat Martin provided the following opening statement: Good Afternoon, this is Pat Martin, Lead Health Compliance Officer for the Town of Arlington. Consistent with the Governor's orders suspending certain provisions of the Open Meeting Law and allowing us to adhere to social distancing requirements during the COVID-19 crisis, this Town of Arlington Board of Health meeting is being held virtually via Zoom for audio and video participation of Board Members and the



public. When you entered this meeting, you were automatically muted. During this meeting you will be unmuted individually as needed. These controls are in place to ensure that today's meeting is safe and effective. At this time, I would like to confirm that all members and persons anticipated on today's agenda are present and can hear me.

Board Members, when your name is called, please respond in the affirmative.

1. Marie Walsh Condon, Absent
2. Kevin Fallon, Aye
3. Ken Kohlberg, Aye

Health Department staff, please responds in the affirmative when your name is called.

1. Ashley Jean, Aye
2. Annette Curbow, Aye
3. Diana Destefano, Aye
4. Pat Martin, Aye
5. Jessica Kerr, Aye

Applicants and Representatives, do we have anyone on the call representing an application?

1. Lisa Contagallo – 15 Russell, Keeping of Hens, Aye

Thank you everyone.

As stated, this Open Meeting of the Arlington Board of Health is being conducted remotely consistent with Governor Baker's Executive Order of March 12, 2020, due to the current State of Emergency in the Commonwealth due to the outbreak of the COVID-19 Virus.

In order to mitigate the transmission of the COVID-19 Virus, the Town of Arlington has been advised and directed by the Commonwealth to suspend public gatherings, and as such, the Governor's Order suspends the requirement of the Open Meeting Law to have all meetings in a publicly accessible physical location. Further, all members of public bodies are allowed and encouraged to participate remotely.

The Order, which you can find posted with agenda materials for this meeting, allows public bodies to meet entirely remotely so long as reasonable public access is afforded so that the public can follow along with the deliberations of the meeting.

Ensuring public access does not ensure public participation unless such participation is required by law. This meeting will have one public comment period, at the end of the meeting. This meeting will have two public comment periods - during the hearings for the keeping of hen applications and one at the end for the general public. If you would like to comment during one of the public comment periods, please use the "Raise Hand" function if on a computer, or "Dial \*9" if on the phone. When your name or phone number is called, and you are unmuted, please state your name and provide your comment. All attendees during the public comment period will be afforded 3 minutes for any comments.

For this meeting, the Board of Health is convening by telephone and computer conference via Zoom as posted on the Town's Website identifying how the public may join.

Only Health Department staff will be able to share their screen during this meeting. Board Members and Department Staff may be participating by video conference. Accordingly, please be aware that other folks may be able to see you. Anything that you broadcast may be captured by the recording.

All of the materials for this meeting are available on the Novus Agenda dashboard, and I recommend that Board Members and the public follow the agenda as posted on Novus unless otherwise noted. Members of the public are encouraged to provide written public comments.

Mr. Martin reviewed some ground rules for effective and clear conduct of our business and to ensure accurate meeting minutes.

Mr. Ken Kohlberg, the Board Chair, will introduce each agenda item. After the item is presented, he will go down the list of Board Members, inviting each by name to provide any comment, questions, or motions. Please hold comments or questions until your name is called and you are unmuted. For any response, please wait until the Chair yields the floor to you, and state your name before speaking.

Finally, each vote taken during this meeting will be conducted by roll-call vote.

Floor yielded to Mr. Ken Kohlberg

Mr. Ken Kohlberg welcomed everyone to today's Board of Health meeting.

## 2. Acceptance of Meeting Minutes from April 28, 2021

Neither Dr. Fallon nor Mr. Kohlberg had any questions or comments regarding the meeting minutes.

A motion made by Ken Kohlberg was seconded by Dr. Fallon to accept the April 28, 2021 meeting minutes as written.

- Dr. Kevin Fallon, Aye
- Mr. Ken Kohlberg, Aye

Motion approved unanimously (2-0)

## 3. COVID-19 Situational Update

Mr. Martin Informed the Board that there were a total of 1864 confirmed cases. For the month of May to date there had been 26 cases. April had 109 new cases and March 174 new cases. As you can see in Arlington, we are trending in the right direction.

On Monday, Gov. Baker announced that on May 29<sup>th</sup> the face covering order will be rescinded and a new advisory will be issued. Face masks will still be required in some sectors such as public transportation.

As of May 18<sup>th</sup>, youth and amateur sports guidance from EEC was amended. Those 18 and younger do not need to wear face coverings. In school, no mask will be required at recess. On May 29<sup>th</sup>, all industry is permitted to reopen.

On June 15<sup>th</sup> the state of emergency will be lifted. Legislature is working on a smooth transition. For us, this may impact zoom meetings.

No comments from the board.

#### 4. Public Health Nurse Update

Jessica Kerr, public health nurse shared that the number of cases for contact tracing are decreasing. With the new regulations, we are fielding a lot of questions in the office, particularly for schools and daycares.

With respect to vaccination, we are still working to vaccinate our senior population with reverse 911 calls and person-to-person outreach with the COA. The COA nurse, Joanne Sliney, is working on providing home bound vaccination.

No comments

#### 5. Hearing: Keeping of Hens – 15 Russell Street

Annette Curbow, Health Compliance Officer, introduced the Keeping of Hens application. A site inspection conducted on April 26 found the coop, food storage, and compost met all set-back requirements. Notification to neighbors was completed in accordance with time limits, and the application was complete. Ms. Curbow had not previously seen a coop of this design, but after hearing about the extra precautions the applicant will put in place to protect against predators as well as research into the coop, Ms. Curbow is confident it will provide sufficient protection to the hens. Ms. Curbow recommended the approval of the application pending final inspection of the coop.

No questions and concerns from the board.

A motion was made by Mr. Kohlberg, which was seconded by Dr. Fallon, to approve the Keeping of Hens application as recommended.

Approved unanimously (2-0)

Ms. Curbow will follow up with the applicant on next steps.

#### 6. Environmental Health Updates

We are fielding several questions regarding the Governors update - particularly as we are working with pools to schedule annual permitting and inspection.

Eskar, a recreational marijuana establishment, was approved for a location in East Arlington. They are moving forward with their application.

## 7. Updates: Restaurants

We have a number of applications in but no new restaurants. We are starting to see a lot more of temporary outdoor dining restaurants. Jimmy's and Sugo should be operational this week. With the end of the state of emergency, there could be some implications as this order allowed the town to move forward with outdoor dining.

As of May 29<sup>th</sup>, restaurants will be able to return to full capacity.

Mr. Kohlberg asked if outdoor seating approvals were a measure authorized due to COVID. Do those approvals stay in place with lifting of restrictions, or do they need new approval?

Mr. Martin stated that there is a certain grace period. Restaurants will be able to operate outdoors through September 15, even without changes. If legislature does not make any changes, the establishments will not be able to continue past September 15. There is still more guidance needed from the state.

## 8. Public Comment

Mr. Martin noted that there are no members of the public in the meeting to comment.

Mr. Kohlberg said that as a town we are very encouraged. The Health Department has done a wonderful job. While we have to stay vigilant, it seems we can see some light at the end of the tunnel.

A Motion to adjourn was made by Dr. Fallon seconded by Mr. Kohlberg.

Roll-call vote to close the Board meeting.

1. Kevin Fallon, Aye
2. Ken Kohlberg, Aye

Meeting adjourned at 2:21 pm.



## Town of Arlington, Massachusetts

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### Eskar Arlington LLC - Permit to Operate a Marijuana Establishment

#### ATTACHMENTS:

	Type	File Name	Description
▢	Reference Material	Eskar_Marijuana_Application_BOH_memo_7-21-2021.pdf	Eskar BOH Memo
▢	Reference Material	Eskar_Marijuana_Application_7-21-2021.docx.pdf	Eskar Application
▢	Reference Material	Arlington_SOPs_Binder1.pdf	Eskar Arlington Sops



**Town of Arlington**  
**Department of Health and Human Services**  
**Office of the Board of Health**  
27 Maple Street  
Arlington, MA 02476

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**Memo**

To: Board of Health Members  
From: Padraig Martin, Lead Health Compliance Officer  
Date: July 16, 2021  
RE: Permit to Operate a Marijuana Establishment- 21 Broadway

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Eskar Arlington LLC. submitted an Application for a Permit to Operate a Marijuana Establishment on June 9, 2021. The proposed location of the facility is 21 Broadway. The permit sought is for the sale of adult use marijuana only, with cultivation and processing remaining off-site. The application was reviewed in accordance with the Town of Arlington Regulations to Ensure the Sanitary and Safe Operation of Adult-Use Marijuana Establishments & the Sale of Adult-Use Marijuana. Upon initial review, it was determined that additional information was required and subsequently requested. Additional information was received on July 14, 2021. It appears the application is complete, insofar as it contains the required elements.

Included in this packet are Eskar's application and supporting materials and architectural review approval from the Cannabis Control Commission. In addition to the above referenced materials, the Board is also being provided with a floor plan and security documents for review. These items contain sensitive security information and will be withheld from the public packet.



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**Application for Permit to Operate a Marijuana Establishment**

☒ Initial   ☐ Renewal

**1. Please provide the following information:**

Corporation Name: Eskar Arlington LLC

Local Address: 21 Broadway, Arlington MA Phone: ( 781-697-9323 )

Corporate Address: 8 JANICE AVE, North Reading, MA 01864

**2. Please provide the following information for the Chief Executive Officer:**

Name: Michael Hunnewell Email: michael.hunnewell@eskarma.com

Address: 56 New Haven St, Boston, MA 02132 Phone: ( 781 ) 697 - 9323

**3. Please provide the following information for the Establishment Operator:**

Name: Michael Hunnewell Position: President/CEO

Email: michael.hunnewell@eskarma.com Phone: ( 781 ) 697- 9323

**4. Please provide the following information:**

- Cannabis Control Commission Certificate of Registration:
- This application is for the following activity (circle all the apply):  
Cultivation   Manufacturing   Retail   Transporter   Other
- If other, please specify:
- If retail only establishment, please indicate location of cultivation/processing:  
N/A we are a recreational marijuana store. We have several vendors to choose from.
- Please indicate location of any other retail establishments operated by the Corporation:  
400 Commerce Drive, Northbridge, MA 01534 (Note: not open for business yet, pending permit)
- Hours of Operation: \_\_ Sunday and Monday, 11am to 7pm; Tuesday through Saturday, 10am to 8pm

**5. Authorization:**

I agree to the following:

- I have read the Town of Arlington Board of Health Regulation to Ensure the Sanitary and Safe Operation of Adult-Use Marijuana Establishments and the Sale of Adult-Use Marijuana and understand I am responsible under this regulation for complying with all applicable local and state regulations and/or laws;
- To abide by the Town of Arlington Regulation to Ensure the Sanitary and Safe Operation of Adult-Use Marijuana Establishments and the Sale of Adult-Use Marijuana ;
- To consent and grant access to the Board of Health, its agent(s) or designee(s) for the purpose of inspection of facilities and/or records;
- To pay promptly to the Town of Arlington any costs or charges associated with the Regulations or any violations thereof;
- To report, in accordance with the Regulation, to all appropriate authorities any significant problems, violations, breaches, thefts or visits by Cannabis Control Commission;
- To indemnify, defend, protect, and hold harmless the Town of Arlington, its selectmen, officers, agents and employees from and against any and all claims, demands, losses, damages, liabilities, fines, charges, penalties, administrative and judicial proceedings and orders, judgments, remedial actions of any kind, all costs and cleanup actions of any kind, and all costs and expenses incurred in connection therewith, including reasonable attorney's fees and costs of defense (collectively, the "losses"), directly or proximately resulting from the Corporation's negligence with regard to any acts, omissions or conduct in any way related to any activity covered by the Regulation, pursuant to its permit, its application therefore, or resulting from the Corporation's failure to comply with the terms of the permit and the Regulation.

I Michael Hunnewell of Estar Arlington LLC  
(Chief Executive Officer) (Corporation)

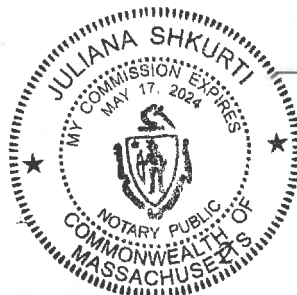
do hereby swear and affirm that all of the facts contained in this application and all attachments are true.

NORFOLK  
Middlesex, ss.

date June 7<sup>th</sup>, 2021 /s/ [Signature]

Subscribed and sworn before me on JUNE 7<sup>th</sup> 20 21

by MICHAEL RICHARD HUNNEWELL



[Signature]  
Notary Public



**6. Please submit one (1) electronic copy and five (5) hard copies of the following items with this application. All items should be clearly marked, collated and bound. Conspicuously identify all materials which are intended to be kept confidential.**

- ☐ Non-refundable application fee (Check or money order made payable to the Town of Arlington);
- ☐ A detailed floor plan of the facility. The floor plan must be drawn to scale and indicate the limited access area, as well as other rooms/areas and their corresponding use, including storage and waste storage areas;
- ☐ A roster and current bios of the members of the Board of Directors of the Corporation;
- ☐ A copy of the applicant's operating policies and procedures, as outlined in section D5 of the Regulation and as submitted with the Cannabis Control Commission application;
- ☐ A copy of the applicant's waste plan as described in Section D25 of the Regulation;
- ☐ A copy or proof of the surety bond as described in Section M of the Regulation;
- ☐ A copy of an estimate from hazardous waste remediation contractor for facility clean-up as described in Section M of the Regulation; (Initial applications only)
- ☐ A copy of the report outlining the annual community meeting, as well as proof of abutter notification and public advertisement. Please note the annual community meeting shall be held no earlier than 90 days prior to expiration of the annual Permit to Operate a Registered Marijuana Dispensary; (Renewal applications only)
- ☐ A Food Establishment Plan Review Application for applicant's wishing to prepare or sell edibles.

**7. Additional requirements for Colocated Marijuana Operations (CMO). No separate application process applicable to CMOs. However, in addition to the requirements set forth in 935 CMR 500.101: Application Requirements, 935 CMR 501.100: Registration of Registered Marijuana Dispensaries, and 501.031: Registration of Independent Testing Laboratories, applicants shall also provide, as part of their application, detailed descriptions of the following:**

- ☐ A proposed plan for inventory – the plan must include entering inventory into the Seed-to-sale SOR so that it separates adult-use and medical-use products, and transferring inventory between an RMDs and a Marijuana Establishment;
- ☐ A proposed plan for transporting marijuana, MIPs, or marijuana products, including plans for how the CMO will comply with 935 CMR 500.105(13): Transportation Between Marijuana Establishments and 935 CMR 501.110(5): Registered Marijuana Dispensary Transportation of Marijuana and MIPs, and which shall prohibit delivery of adult-use products; and
- ☐ A proposed plan for maintaining records, including plans for separating financial records for adult-use products to ensure compliance with the applicable tax laws;

\*Please note the Board of Health may require and request additional information to process this application.

Submit this application and supporting materials to:

Department of Health and Human Services  
Office of the Board of Health  
Attn.: Padraig Martin, Health Compliance Officer  
27 Maple St.  
Arlington, MA 02476  
pmartin@town.arlington.ma.us

Renewal applications shall be submitted no later than 30 days prior to expiration of the annual permit.

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**For Office Use Only**

Application received on this day \_\_\_\_\_ by: \_\_\_\_\_  
(BOH Staff)

To be heard by the Board of Health at the meeting to be held on \_\_\_\_\_



## Board of Director Biographies

### **Michael Hunnewell**

Michael Hunnewell has over 10 years of government contracting expertise and over 15 years of experience in high tech, cutting-edge industries. In 2018 Mr. Hunnewell was able to rezone 26 acres of residential land in Northbridge, MA to industrial for cannabis use, making this one of the single largest pieces of cannabis real estate in the Commonwealth of Massachusetts. Prior to his work founding Eskar, Mr. Hunnewell worked in defense & aerospace, acquiring individual government contracts of over \$4M each alongside commercial orders earning over \$1M each. Mr. Hunnewell tripled shareholder value over a 3-year period for his firm while also opening up global distribution channels to increase sales. From his time in the defense sector, Mr. Hunnewell has garnered extensive experience in handling sensitive information and products. Metamagnetics, Mr. Hunnewell's previous employer, holds a SECRET level organization clearance and recently spent over \$100K in 2019 alone updating their security protocols. Mr. Hunnewell has also worked diligently with the firm's supplier group to make sure Metamagnetics was in compliance with defense manufacturing standards (i.e. ISO9000) and the firm is now an approved supplier to some of the largest defense firms in the world including Lockheed Martin and Raytheon. Mr. Hunnewell received his B.A. in biology from Boston College and his MBA from Northeastern University with a concentration in innovation for high tech industries. He attended graduate school on academic scholarship.

### **Michael Aldi**

Michael Aldi has over a decade of experience in both the real estate and hospitality industry. In his role as Eskar LLC's head of Real Estate Development and Investor Relations, Mr. Aldi is responsible for all the company's capital raising initiatives and site selection activities. Mr. Aldi is responsible for managing the preparation of complex financial forecasts in addition to conducting in-depth market research for the team's prospective locations. Mr. Aldi has experience in all facets of site selection, lease negotiation, general contracting/construction management, and capital structuring/financing. Mr. Aldi also has experience underwriting structuring opportunities for his family's portfolio of hospitality and real estate investments. Mike graduated from Suffolk University, with a B.A. in Communications and a Minor in Business Management.

### **Brian Navarro**

Brian is the managing partner of Greylock Property Group, LLC. During his 40-year career, Brian has been successful in the ownership and development of numerous of retail, multifamily, and mixed-use properties and projects.

His experience in owning and managing larger multi-family and retail properties started as a co-founder and principal of the Grove Investment Group, a collection of private partnerships, and



Grove Property Trust, a public REIT, formally traded on the AMEX. The multifamily portfolio of Grove Property Trust, containing over 7,000 units throughout New England, was sold in 2001 and he remained one of the managing partners (owning approximately 20%) of the Trust's retail portfolio and other properties (Grove Property Fund), which total approximately \$120 million in value. Grove currently operates retail and residential properties or developments in many high-demand markets in the Northeast and Southeast including Glastonbury, CT; Simsbury CT; Charleston, SC; Edgartown, MA; and Longmeadow, MA. He was also a partner in the development/ownership of a large portfolio of medical office buildings which were recently sold to HTA Corporation, a large public REIT. Since 2003, Brian has been the managing partner of a Mystic, CT based real estate group. Greylock Property Group, LLC is a private real estate investment group that under various entities operates a portfolio of existing income properties and acts as a developer of mixed-use and residential properties in high-demand and coastal markets. The current portfolio owns a mix of conventional shopping center retail and specialty retail property in towns such as historic downtown Mystic, CT; West Hartford Center, CT; Edgartown, MA; Clinton, CT; Amelia Island, FL; Gulf Breeze, FL; and historic downtown Saint Augustine, FL. Current retail and multifamily projects in various stages of development are located in Mystic, CT; Niantic; Stonington, CT; Clinton, CT; and Bedford, MA. Our target development markets are primarily suburban, tourist oriented or near a classic small town downtown areas.



January 28, 2021

Eskar Arlington, LLC  
MR282638  
Mike.r.hunnewell@gmail.com

### **NOTICE: ARCHITECTURAL REVIEW REQUEST APPROVED**

#### **WHY ARE YOU RECEIVING THIS NOTICE?**

This notice constitutes approval that the licensee submitted a compliant Architectural Review Request and may now start the construction or renovations requested at the location identified below:

21 Broadway Street, Arlington, MA 02474

#### **WHAT ARE YOUR NEXT STEPS?**

The licensee may now start the construction or renovations requested at the location stated above. Please note that the licensee must remain in full compliance with Commission regulations, license conditions, and local bylaws or ordinances. Please keep a copy of this notice with your business records.

To request an inspection for final licensure, all construction or renovations must be completed, and a certificate of occupancy must have been issued. In addition, licensees should be registered in Metrc. The licensee must have an inspection prior to being recommended for final licensure.

Once ready for an inspection, please complete the Post-Provisional License Inspection ("PPLI") Request form that was originally included in the Notice: Provisional Licensure sent after the Commission approved the licensee for a provisional license and include documentation of a certificate of occupancy. This form shall be sent to [inspections@cccmass.com](mailto:inspections@cccmass.com).

If there are any questions with regards to this notice, please contact the Commission at [inspections@cccmass.com](mailto:inspections@cccmass.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Shawn Collins', with a long horizontal flourish extending to the right.

Shawn Collins  
Executive Director





# CLEAN MANAGEMENT ENVIRONMENTAL GROUP, INC.

Quote #  
53256

Prepared for:

Michael Hunnewell  
Eskar  
TBD  
TBD, MA 02132  
781-697-9323  
michael.hunnewell@eskarma.com

5/21/2021  
Sales Rep:  
Ken Richard  
P: 800-538-8131  
F: 843-538-7845

**What sets us apart:**

- ✓ Live Operators
- ✓ Nationwide Service
- ✓ 150 Years of Experience
- ✓ \$5,000,000 in insurance
- ✓ CERCLA approved TSDF
- ✓ No Contracts

**Other Services:**

- ✓ Hazardous/Nonhazardous waste disposal
- ✓ Lab Pack Services
- ✓ Expired/outdated/offspec product destruction
- ✓ Tank and pit cleanings/removal
- ✓ Soil remediation and spill cleanups
- ✓ OSHA/Hazwoper training

We understand that the key to a successful business relationship is quality customer service. Clean Management appreciates the opportunity to quote the following:

Qty	Description	Price	Unit
1	Flower , edibles , shatter ,wax	\$425.00	per 55g Drum
1	Tincture (flammable) (Treatable)	\$305.00	per 5g Pail
1	Batteries from vape pens (LI) (\$205.00 per pail MINIMUM or \$6.75 per pound)	\$205.00	per 5g Pail
1	Vape Carts (INCIN) (INCIN ONLY!! \$375.00 MINIMUM PER PAIL OR 12.75 per pound)	\$375.00	per 5g Pail
1	Transportation Stop Charge	\$550.00	per Stop
1	E-Manifest Fee	\$45.00	Per Manifest
1	Environmental Management Fee	15.00 %	of Total
**Price includes Transportation, Disposal, Profiles, Manifests, and Labels**			
**Prices pending profile acceptance**			

\* Off-Spec material, water, additional chemicals and unspecified solids not profiled will be charged accordingly. All state waste taxes will apply. Fuel surcharges apply based on current D.O.E. Rates.

### **Transportation of Marijuana**

Pursuant to 935 CMR 500.105(13)(a), Eskar Arlington, LLC (“Eskar”) will only transport marijuana between its licensed Marijuana Establishments and by its registered marijuana establishment agents. All Marijuana Establishments involved in the transportation will ensure that the products are linked to seed-to-sale tracking and any undeliverable product or refused product will be shipped to the originating establishment in accordance with 935 CMR 500.105(13)(a)(5). All vehicles will be staffed by a minimum of two agents, with at least one remaining in the vehicle at all times. Prior to leaving the Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment will weigh, inventory, and account for, on video, all marijuana products to be transported. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest. The product will be weighed and inventoried upon both departure and arrival and a log will be maintained describing any vehicle stops. All routes will be randomized and will be within the Commonwealth.

In accordance with 935 CMR 500.105(13)(c), when transporting marijuana products, not other products will be transported or stored in the same vehicle. Storage and transportation of finished products will be under conditions that will protect them against physical, chemical and microbial contamination as well as against deterioration of finished products or their containers pursuant to 935 CMR 500.105(3)(b)(15).

Eskar will be in compliance with all transportation storage requirements when marijuana products in the vehicle of 935 CMR 500.105(13)(d), including the use of secure, locked storage compartments that are not part of the vehicle transporting the marijuana; and the use of a sufficiently secure storage compartment that cannot be easily removed.

Pursuant to 935 CMR 500.105(13)(b), Marijuana Establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of the discrepancy. Eskar Marijuana Establishment Agents will report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

All Eskar agents involved in transportation of marijuana products will have a drivers license in good standing issued by the Massachusetts Registry of Motor Vehicles and will carry their agent registration card at all times in compliance with 935 CMR 500.105.(13)(g).

In accordance with 935 CMR 500.105(13)(b), Eskar agents will document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities within 24 hours of the discovery of the discrepancy. All vehicles accidents, diversions, losses or other incidents deemed reportable that occur during transport shall be reported within 24 hours.

All vehicles that are used for transport shall comply with 935 CMR 500.105(13)(c). The vehicle used for transportation will be owned or leased by Eskar, properly registered, inspected and insured with the Commonwealth, equipped with a Commission-approved alarm system and have heating

Eskar Arlington, LLC  
Management and Operations Profile  
Operating Policies and Procedures

and cooling systems appropriate for marijuana products. Eskar will use a vehicle to transport marijuana products that contained a GPS monitoring device that is in compliance with 935 CMR 500.105(13)(e). Each Eskar Marijuana Establishment Agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products. The vehicle will not have any markings that indicate the content and marijuana products will not be visible from outside the vehicle. As stated in 935 CMR 500.105(3)(b)(16), all vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Pursuant to 935 CMR 500.105(13)(d), Eskar will transport marijuana products in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products and the storage compartment will be sufficiently secure that it cannot be easily removed.

Eskar will ensure that each vehicle transporting marijuana products will have a GPS monitoring device that complies with 935 CMR 500.105(13)(e). Each Eskar agent transporting marijuana will have access to a secure form of communication and will test said devices prior to and immediately after leaving the originating location. Contact will be made with the originating location every 30 minutes throughout the trip.

Manifests will be completed in accordance with 935 CMR 500.105(13)(f). All transportation manifests shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provided to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transport, pursuant to 935 CMR 500.105(f)(1). Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.

Pursuant to 935 CMR 500.105(13)(f)(3), upon arrival, the agent at the destination establishment shall compare the manifest produced by the agents who transported the marijuana to the copy transmitted by facsimile or email. This manifest must, at a minimum, include: the originating establishment name, address, and license number; the names and registration numbers of the agents who transported the marijuana; the name and registration number of the agent who prepared the manifest; the destination establishment name, address, and license number; a description of the products being transported, including the weight; the mileage of the transporting vehicle at departure from the originating establishment, at the destination, and upon return at the originating establishment; the date and time of departure from originating the establishment and arrival at destination establishment; a signature line for the agent who receives the marijuana products; the weight and inventory before departure and upon receipt; the date and time that the transported products were re-weighed and re-inventoried; the name of the agent at the destination establishment who re-weighed and re-inventoried products; and the transportation vehicle's make, model, and license plate.

The manifest will be maintained within the vehicle during the entire transportation process, until delivery is completed. Eskar will retain all transportation manifests for no less than one year and make them available to the Commission upon request.



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### **Dispensing Procedures**

Pursuant to 935 CMR 500.140(2), upon entry into the premise Eskar Arlington, LLC (“Eskar”) by an individual, an Eskar registered marijuana establishment agent shall immediately inspect the individual’s proof of identification. An individual shall not be admitted to the premise unless the registered marijuana establishment agent has verified that the individual is 21 years of age or older by offering proof of identification.

Acceptable proof of identification is limited to:

- a. Massachusetts Issued driver’s license
- b. Massachusetts Issued ID card
- c. Out-of-state driver’s license or ID card (with photo)
- d. Passport
- e. U.S. Military I.D.

**A patient registration card is not sufficient proof of age.**

If the customer does not have a valid ID or for any reason the identity of the consumer, or the validity of the ID is in question, they will not be allowed to enter the facility.

Eskar reserves the right to refuse to sell marijuana products to a consumer if, in the opinion of the Eskar agent based on the information available to said agent at that time, the consumer or the public would be placed at risk, in accordance with 935 CMR 500.140(4)(b). In accordance with M.G.L. c. 94G, §7, and 935 CMR 500.140(3)(c), Eskar will not sell more than one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction. Additionally, Eskar understands the prohibition on selling marijuana products containing nicotine and the prohibition on selling marijuana products containing alcohol, if sales of such alcohol would require licensure pursuant to M.G.L. c. 138.

All products sold to customers will meet the requirements of 935 CMR 500.105(5)(a)-(d) addressing labeling of marijuana, marijuana products, edible marijuana infused products, marijuana concentrates and extracts and marijuana infused tinctures and topicals. Each label will include, but not be limited to: name and registration of marijuana cultivator and/or product manufacturer; the name of the product; quantity of usable marijuana; type of marijuana used in the product; directions for use of the marijuana if relevant; and a symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product. Eskar will only use a point-of-sale system that has been approved by the Commission, in consultation with the DOR.

At the point of sales, consumers will again present their proof of identification to the Sales Agent to verify the consumer’s age before the transaction is processed. Eskar will not utilize software or other methods to manipulate or alter sales data in compliance with 935 CMR 500.140(5)(c). Eskar will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Eskar will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Eskar determines that software had been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data we will: disclose the information to the Commission; cooperate with the Commission in an investigation relative to data

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manipulation; and take other action as directed by the Commission to comply with the applicable regulations

Eskar will employ separate accounting practices at the point-of-sale for marijuana and marijuana products sales, and non-marijuana sales, in accordance with 935 CMR 500.140(5)(f). Eskar understands that the Commission and the Department of Revenue may audit and examine the point-of-sale system used by Eskar in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000. Pursuant to 935 CMR 500.140(5)(b), Eskar may utilize a sales recording module that has been approved by the Department of Revenue.

Pursuant to 935 CMR 500.140(6) Eskar will make available education materials about marijuana products to consumers. Eskar will ensure an adequate supply is available and offered in commonly utilized languages, including appropriate materials for the visually and hearing impaired. Eskar will have these materials available to the Commission for inspection upon request. The educational material, at a minimum, will include: a warning that marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children; A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated; Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration; Materials offered to consumers to enable them to track the strains used and their associated effects; Information describing proper dosage and titration for different routes of administration, emphasizing the use of the smallest amount and explaining potency of the products; A discussion of tolerance, dependence, and withdrawal; Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs; A statement that consumers may not sell marijuana to any other individual; Information regarding penalties for possession or distribution of marijuana in violation of Massachusetts law; and any other information required by the Commission.

### **Procedures for Quality Control and Testing of Product**

Pursuant to 935 CMR 500.160, Eskar Arlington, LLC (“Eskar”) will not sell or market any marijuana product that is not capable of being tested by Independent Testing Laboratories, including testing of marijuana products and environmental media. Eskar will implement a written policy for responding to laboratory results that indicate contaminant levels that are above acceptable levels established in DPH protocols identified in 935 CMR 500.160(1) and subsequent notification to the Commission of such results. Results of any tests will be maintained by Eskar for at least one year. All transportation of marijuana to or from testing facilities shall comply with 935 CMR 500.105(13) and any marijuana product returned to Eskar by the testing facility will be disposed of in accordance with 935 CMR 500.105(12). Eskar will never sell or market adult use marijuana products that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

In accordance with 935 CMR 500.130(2), Eskar will prepare, handle and store all edible marijuana products in compliance with the sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*. In addition, Eskar’s policies include requirements for handling of marijuana, pursuant to 935 CMR 500.105(3), including sanitary measures that include, but are not limited to: hand washing stations; sufficient space for storage of materials; removal of waste; clean floors, walls and ceilings; sanitary building fixtures; sufficient water supply and plumbing; and storage facilities that prevent contamination.

Pursuant to 935 CMR 500.105(11)(a)-(e), Eskar will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. Eskar will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. Eskar storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest. The Eskar storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

Eskar has a Quality Manager who will oversee the Eskar facility to maintain strict compliance with DPH regulations and protocols for quality control and analytical testing. In accordance with 935 CMR 500.160. All Marijuana Infused Products (“MIPs”) sold will be produced using good manufacturing practices and safe practices for food handling to ensure quality and prevention of contamination.

All Eskar agents whose job includes contact with marijuana or nonedible marijuana products is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*. All Eskar agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including personal cleanliness and thorough hand-washing. The hand-washing facilities will be adequate and convenient with running water at a suitable temperature and conform with all requirements of 935 CMR 500.105(3)(b)(3).

Eskar will provide sufficient space for placement of equipment and storage of materials as is

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necessary for the maintenance of sanitary operations, in accordance with 935 CMR 500.105(3)(b)(4). Litter and waste will be properly removed and disposed of and the operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12). The floors, ceilings and walls will be constructed in a way that allows them to be adequately cleaned and in good repair. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition in compliance with 935 CMR 500.105(3)(b)(9). All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products.

Pursuant to 935 CMR 500.105(3)(b)(11), Eskar's water supply will be sufficient for necessary operations able to meet our needs. The plumbing requirements of 935 CMR 500.105(3)(b)(12) will be met through adequate size and design and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Eskar facility. Eskar will also provide our employees with adequate, readily accessible toilet facilities that are maintained in sanitary condition and in good repair. All products that can support the rapid growth of undesirable microorganisms will be held in a manner that prevents the growth of these microorganisms.

Our quality assurance manager will ensure all batches of Marijuana and MIPs will be tested, by an independent testing laboratory pursuant to 935 CMR 500.160. All products shall be tested for the cannabinoid profile and for contaminants as specified by the Department, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides.

Environmental media will be tested in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Department of Public Health pursuant to 935 CMR 500.160(1). All testing results will be maintained by Eskar for no less than one year in accordance with 935 CMR 500.160(3).

Samples that fail testing will be reported and destroyed. Pursuant to 935 CMR 500.160(9), no marijuana product shall be sold or marketed for sale that has not first been tested and deemed to comply with the Independent Testing Laboratory standards.

### **Energy Compliance Plan**

At all times, Eskar Arlington, LLC (“Eskar”) Retail Marijuana Establishment will satisfy minimum energy efficiency and conservation standards as required by the Commission and in accordance with 935 CMR 500.105(15). Eskar will strive to reduce energy demand, including by not limited to, the following:

- Use of natural lighting where feasible;
- Purchase and installation of LED lights, where feasible;
- Utilization of advanced and energy efficient HVAC systems, where feasible;
- Insulated glazing, where feasible;
- New building insulation, where feasible; and
- New exterior doors.

Eskar will work closely with the general contractors and the local utility to create and execute an energy savings plan, including:

- Seek to implement International Building Code requirements for sustainable and energy conservation in construction;
- Construct the facility in accordance with energy compliance plan goals;
- Understand how we consume energy through analysis generation;
- Compare our operation with similar businesses and act accordingly;
- Solicit customized energy improvement recommendations from professionals and determine how and if such recommendations can be incorporated into our business plan; and
- Identify cost incentives through utility energy programs, such as Mass Save programs to explore financial incentives for energy efficiency and demand reduction measures.

## **ESCROW AGREEMENT**

This Escrow Agreement is made and entered into by and among Eskar, LLC ("APPLICANT") having an address at 15 Forbes Street, Apartment 2, Boston, MA and Bershtein, Volpe & McKeon PC, as Trustee ("ESCROW ACCOUNT HOLDER"), 900 Chapel Street, New Haven, CT

It is agreed that ESCROW ACCOUNT HOLDER will escrow \$5,000.00 pursuant to 935 CMR 500.105(16)(c) for APPLICANT, constituting an amount sufficient to adequately support the dismantling and winding down of their Retail Marijuana Establishment in ARLINGTON, MA as required by the Cannabis Control Commission pursuant to 935 CMR 500.101(1)(a)(5). These funds shall be released and be payable to the Cannabis Control Commission or the Marijuana Regulation Fund in the event the Commission demonstrates that it has incurred costs to dismantle and wind down the Marijuana Establishment.

This money will be placed into ESCROW ACCOUNT HOLDER's IOLTA account. This is an account regulated by the rules of professional conduct into which attorneys' place client funds. The interest on the account is paid, by law, into a fund for civil legal services to individuals who cannot afford an attorney.

The Escrow Agent may resign upon thirty (30) days prior written notice to the parties to this Escrow Agreement. Upon appointment of a successor escrow agent, the Escrow Agent shall promptly deliver the Documents, if any, the Proceeds, if any and any other documents or property to the successor escrow agent.

If a successor agent has not been appointed within a thirty (30) day period, the Escrow Agent may petition any court of competent jurisdiction to appoint a successor.

The rights created by this Escrow Agreement shall inure to the benefit of, and the obligations created hereby shall be binding upon the successors and assigns of the Escrow Agent and all parties to this Escrow Agreement.

It is hereby recognized and agreed that the Escrow Agent shall not be obligated to take any action that is not specifically set forth herein. In the

event of a disagreement or dispute concerning the validity or interpretation of any condition of this Escrow Agreement, the Escrow Agent shall be empowered to submit the dispute to a court of competent jurisdiction for resolution. In such event, the Escrow Agent shall be relieved of any other and further liability under this Escrow Agreement.

This Escrow Agreement shall be construed and enforced in accordance with the laws of the Commonwealth of Massachusetts.

Dated this 17<sup>th</sup> of November, 2019.

Bershtein, Volpe & McKeon, PC, as Trustee

Eskar, LLC

By: [Signature]  
By: [Signature]  
Its President

Its: Manager



## **Inventory Procedures**

Pursuant to 935 CMR 500.105(8), Eskar Arlington, LLC (“Eskar”) receive a retail license prior to its affiliated entity receiving a cultivation and product manufacturing license from the Commission, if Eskar chooses to apply for those licenses at some point in the future, it will obtain marijuana and marijuana products from partnering Cannabis Control Commission licensed Producers and Wholesalers.

Pursuant to 935 CMR 500.105(8)(c), Eskar will establish inventory controls for the conduct of inventory reviews; conduct a monthly inventory of stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

Real time inventory will be maintained as specified by the Commission and in accordance with 935 CMR 500.105(8)(c) and (d). Plant inventory will be taken daily and any time plants are moved from their pre-existing location Eskar will maintain real-time inventory and tracking procedures in compliance with 935 CMR 500.105(8)(b). Any discrepancies discovered when conducting plant inventory will be reported to the inventory manager on the same day.

Plants will be scanned utilizing seed-to-sale tracking pursuant to 935 CMR 500.105(8)(e) once they enter a new room, or change location within a room. Scanned plants will have their existing location, as well as current phase scanned into the seed-to-sale tracking system to reflect their status. Once a section of plants is scanned, the current scan count should be checked in the seed-to-sale tracking system to confirm the accurate number of plants being changed. Weekly plant count checks will be performed to confirm accuracy, as well as, prevent accumulation of discrepancies in plant inventory. Pursuant to 935 CMR 500.105(8)(f), no marijuana product, including marijuana, will be sold by Eskar or marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Marijuana infused products and flower inventory will be tracked and managed in the seed-to-sale tracking system and all product will be stored in the vault.

### **Maintaining of Financial Records**

Eskar Arlington, LLC's ("Eskar") policy is to maintain financial records in accordance with 935 CMR 500.105(9)(e). The records will include manual or computerized records of assets and liabilities, monetary transactions; books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices and vouchers; sales records including the quantity, form, and cost of marijuana products; and salary and wages paid to each employee, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the non-profit corporation.

Eskar will conduct monthly sales equipment and data software checks and initiate reporting requirements for discovery of software manipulation as required by 935 CMR 500.140(5)(d). Eskar will not utilize software or other methods to manipulate or alter sales data in compliance with 935 CMR 500.140(5)(c). Eskar will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Eskar will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Eskar determines that software had been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data we will: disclose the information to the Commission; cooperate with the Commission in an investigation relative to data manipulation; and take other action as directed by the Commission to comply with the applicable regulations. Pursuant to 935 CMR 500.140(5)(e), Eskar will comply with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements.

Eskar will implement separate accounting practices for marijuana and non-marijuana sales pursuant to 935 CMR 500.140(5)(f).

Following the closure of Eskar, all records will be kept for at least two years at the expense of Eskar and in a form and location acceptable to the Commission, in accordance with 935 CMR 500.105(9)(g). Financial records shall be kept for a minimum of three years from the date of the filed tax return, in accordance with 830 CMR 62C.25.1(7) and 935 CMR 500.140(5)(e).

## **Personnel Policies**

It is Eskar Arlington, LLC (“Eskar”) policy to provide equal opportunity in all areas of employment, including recruitment, hiring, training and development, promotions, transfers, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment, in accordance with applicable federal, state, and local laws. Eskar will make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable law.

Management is primarily responsible for seeing that equal employment opportunity policies are implemented, but all members of the staff share the responsibility for ensuring that, by their personal actions, the policies are effective and apply uniformly to everyone. Any employee, including managers, determined by Eskar to be involved in discriminatory practices are subject to disciplinary action and may be terminated. Eskar strives to maintain a work environment that is free from discrimination, intimidation, hostility, or other offenses that might interfere with work performance. In keeping with this desire, we will not tolerate any unlawful harassment of employees by anyone, including any manager, co-worker, vendor or clients.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of Eskar that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. Eskar will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; and key state and local laws.

All Eskar policies will include a staffing plan and corresponding records in compliance with 935 CMR 500.105(1)(i) and ensure that all employees are aware of the alcohol, smoke, and drug-free workplace policies in accordance with 935 CMR 500.105(1)(k). Eskar will also implement policies to ensure the maintenance of confidential information pursuant to 935 CMR 500.105(1)(l). Eskar will enforce a policy for the dismissal of agents for prohibited offenses according to 935 CMR 105(1)(m).

All Eskar employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All marijuana establishment agents will complete a training course administered by Eskar and complete a Responsible Vendor Program in compliance with 935 CMR 500.105(2)(b). Employees will be required to receive a minimum of eight hours of on-going training annually pursuant to 935 CMR 500.105(2)(a).

### **Plan for Obtaining Marijuana or Marijuana Products**

Eskar Arlington, LLC (“Eskar”) is currently not affiliated with any entity holding a license to cultivate marijuana or manufacture marijuana products in the Commonwealth of Massachusetts pursuant to 935 CMR 500.000 et seq. As such, Eskar plans to purchase marijuana and marijuana products from those entities licensed to cultivate and manufacture marijuana and marijuana products under 935 CMR 500.000 et seq. Eskar will ensure that all marijuana and marijuana products purchased from licensed marijuana cultivators and product manufacturers are in compliance with 935 CMR 500.160(9), requiring marijuana and marijuana products be tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160 prior to the sale or marketing for adult use of any such marijuana or marijuana product.

### **Prevention of Diversion**

Eskar Arlington, LLC (“Eskar”) anti-diversion procedures includes methods for identifying, recording, and reporting diversion, theft, or loss and for correcting all errors and inaccuracies in inventories. The integrity of the supply chain in every stage from seed to sale shall be protected through anti-diversion methods using a comprehensive security system. All employees shall receive anti-diversion training as part of their initial and subsequent training. Eskar has established a work environment that values employees and that fosters a culture of responsibility to mitigate risk and create a safe work environment. Pursuant to 935 CMR 500.105(1)(m), Eskar’s Written Operating Procedures will include a policy for the immediate dismissal of any marijuana establishment agent who has diverted marijuana.

Continual supply chain risk assessments will be performed to reduce vulnerability and ensure continuity. Any discrepancies identified in inventory shall immediately be recorded and investigated to the cause. Pursuant to 935 CMR 105(13)(b), any incidents of diversion that occur during transport between marijuana establishments shall be duly reported to the Commission and law enforcement authorities. In addition, discrepancies shall be recorded and reported according to Eskar’s incident response plan.

Upon entry into the premise of Eskar by an individual, an Eskar agent shall immediately inspect the individual’s proof of identification. An individual shall not be admitted to the premise unless the retailer has verified that the individual is 21 years of age or older by offering proof of identification. Pursuant to 935 CMR 500.140(4)(a) Eskar will refuse to sell marijuana to any consumer who is unable to produce a valid form of identification.

Eskar reserves the right to refuse to sell marijuana products to a consumer if, in the opinion of the Eskar agent based on the information available to said agent at that time, the consumer or the public would be placed at risk, in accordance with 935 CMR 500.140(4)(b).

In accordance with 935 CMR 500.140(3), all on site transactions are limited to one ounce of marijuana to a customer per transaction. Random and routine monitoring and surveillance cameras shall be performed by security personnel.

In accordance with 935 CMR 500.110(5), Eskar will have a security system to prevent and detect diversion, theft or loss of marijuana. Pursuant to 935 CMR 500.110(5)(a)-(g), Eskar’s security system shall include, but is not limited to: perimeter alarms; failure notification system that provides an alert within 5 minutes of failure; duress alarm; video cameras in all areas containing marijuana; 24-hour recordings that are retained for at least 90 days, contain a date and time stamp and can be exported as still images; and the ability to remain operational during power outages. Additionally, the security system will be maintained in secure locations with a back-up alarm system provided by Eskar different than that provided by our primary system. Access to said systems will be limited to personnel essential to security operations, law enforcement, the security Eskar and the Commission. All equipment shall be in good working order at all times.

Any incident occurring at the Eskar facility that is a breach of security shall be immediately reported within 24 hours to law enforcement and the Commission, pursuant to 935 CMR 500.110(9). Breaches include, but are not limited to: discovery of discrepancies of inventory; diversion, theft or loss of product; criminal action involving the Eskar facility; unauthorized

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destruction of marijuana or suspicious acts involving said marijuana; loss or alteration of records; and alarm activation or failure of the security system. Incident reports shall be submitted to the Commission within 10 days of the occurrence of the act and documentation of the incident will be maintained for at least one year or throughout the duration of any related investigation.

Eskar will annually obtain a security system audit by a vendor approved by the Commission and at Eskar's expense, pursuant to 935 CMR 500.100(10). Eskar will submit said report within 30 days after the audit is completed and, if areas of concerns are identified, Eskar will submit a mitigation plan to address the issue.

Inventories will be highly restricted, secured, and surveilled areas with posted limited access. Only managers shall have security designations to access stored inventory. Monthly inventory checks in compliance with 935 CMR 105(8)(c)(2) will be conducted. A dispensary agent's inventory shall remain locked and accessible only to that agent and a manager. The manager shall conduct routine and random auditing of dispensary agents inventory. Sales shall be documented, recorded and stored using seed-to-sale inventory tracking. Surveillance cameras shall record and store all transactions in compliance with 935 CMR 500.110(5)(a)(4).

Pursuant to 935 CMR 500.105(11)(a)-(e), Eskar will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. Eskar will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. Eskar storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest. The Eskar storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

Eskar storage policy dictates that product may only be stored in areas under video surveillance. Only authorized marijuana establishment agents have access to product storage areas, product storage keys, and or access cards. Storage rooms must remain locked at all times except times needed to transfer product. Marijuana establishment agents in product rooms without authorization, or good reason, will be terminated. All product must be returned to storage at the end of processing work orders, or at the end of the business. For processing that takes more than one day, processing area and product must be locked inside an area with adequate security.

All finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft or loss, pursuant to 935 CMR 500.110(1)(f). Additionally, Eskar will prohibit keys, if any, from being left in the locks or stored or place in a location accessible to persons other than specifically authorized personnel. Eskar will also ensure that that all marijuana products are kept out of plain sight and are not visible from a public place without the use of binoculars, optical aids or aircraft.

Pursuant to 935 CMR 500.105(12)(b), all liquid waste containing marijuana or marijuana byproducts shall be disposed of in compliance with all applicable state and federal requirements. Any remaining marijuana waste shall be ground and mixed with other organic materials, as defined in 301 CMR 16.02 and in accordance with 935 CMR 500.105(12)(c)(2.b). Solid waste containing cannabis waste generated at our Marijuana Establishment may be ground up and mixed with solid wastes such that the resulting mixture renders the cannabis unusable for its original purpose, in

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compliance with 935 CMR 500.105(12)(c). A minimum of two Marijuana Establishment Agents must witness and document how the marijuana waste is disposed or otherwise handled in accordance with 935 CMR 500.105(12)(d).

Pursuant to 935 CMR 500.105(13)(d), Eskar will transport marijuana products in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products and the storage compartment will be sufficiently secure that it cannot be easily removed. If Eskar plans to transport marijuana products to multiple other establishments in the future, it will seek the Commission's permission to adopt reasonable alternative safeguards.

A copy of the shipping manifest shall be transmitted to the receiving dispensary prior to transport. All dispensary deliveries shall be processed prior to leaving a marijuana establishment in accordance with 935 CMR 500.105(13)(a)(7). Pursuant to 935 CMR 500.105(13)(a)(6) all vehicles transporting marijuana products will be staffed with a minimum of two marijuana establishment agents and one agent shall remain with the transportation vehicle at all time. Delivery routes and times will be randomized as required by 935 CMR 500.105(13)(a)(12).. Once the delivered product is accounted for, it shall be stored in the locked and secured and monitored safe room.

In case of loss inventory discrepancies discovered by any employee shall be reported to the department manager upon discovery. The manager shall report all unresolved inventory discrepancies to the Cannabis Control Commission and law enforcement authorities in accordance 935 CMR 500.105(13)(b). An internal investigation to determine the outcome of the inventory discrepancy will also be conducted.

### **Qualifications and Training**

Pursuant to 935 CMR 500.105(2)(a) Eskar Arlington, LLC (“Eskar”) will ensure all dispensary agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function. Dispensary agents will be trained for one week before acting as a dispensary agent. At a minimum, staff shall receive eight hours of on-going training annually. New dispensary agents will receive employee orientation prior to beginning work with Eskar. Each department managed will provide orientation for dispensary agents assigned to their department. Orientation will include a summary overview of all the training modules.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of Eskar that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. Eskar will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; and key state and local laws.

All employees will be registered as agents, in accordance with 935 CMR 500.030. All Eskar employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All registered agents of Eskar shall meet suitability standards of 935 CMR 500.800.

Training will be recorded and retained in dispensary agents file. Training records will be retrained by Eskar for at least one year after agents’ termination. Dispensary agents will have continuous quality training and a minimum of 8 hours annual on-going training.



### **Record Keeping Procedures**

Eskar Arlington, LLC's ("Eskar") records will be available to the Cannabis Control Commission ("CCC") upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection, in addition to written operating procedures as required by 935 CMR 500.105(1), inventory records as required by 935 CMR 500.105(8) and seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).

Eskar will also keep all waste disposal records as required by 500.105(12), including record keeping procedures. Eskar will ensure that at least 2 Marijuana Establishment Agents witness and document how the marijuana waste is disposed or otherwise handled in accordance with 935 CMR 500.105(12). When the marijuana products or waste is disposed or handled, Eskar will create and maintain a written or electronic record of the date, the type, and quantity disposed or handled, the manner of disposal or other handling, the location of the disposal or other handling, and the names of the Agents present during the disposal or handling, with their signatures. Eskar will keep these records for at least 3 years.

Personnel records will also be maintained, in accordance with 935 CMR 500.105(9)(d), including but not limited to, job descriptions for each employee, organizational charts, staffing plans, personnel policies and procedures and background checks obtained in accordance with 935 CMR 500.030. Personnel records will be maintained for at least 12 months after termination of the individual's affiliation with Eskar, in accordance with 935 CMR 500.105(9)(d)(2). Additionally, business will be maintained in accordance with 935 CMR 500.104(9)(e) as well as waste disposal records pursuant to 935 CMR 500.104(9)(f), as required under 935 CMR 500.105(12).

Following the closure of the Marijuana Establishment, all records will be kept for at least two years at the expense of Eskar and in a form and location acceptable to the Commission, pursuant to 935 CMR 500.105(9)(g). In accordance with 935 CMR 500.105(9), records of Eskar will be available for inspection by the Commission upon request. Eskar's records will be maintained in accordance with generally accepted accounting principles. Eskar will have all required written records and available for inspection, including all written operating procedures as required by 935 CMR 500.105(1) and business records as outlined by 935 CMR 500.105(9)(e).

### **Restricting Access to Age 21 or Older**

Upon entry into the premise of Eskar Arlington, LLC (“Eskar”) by an individual, a Eskar agent shall immediately inspect the individual’s proof of identification. An individual shall not be admitted to the premise unless the retailer has verified that the individual is 21 years of age or older by offering proof of identification. Eskar’s management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of Eskar are 21 years of age or older.

To verify an individual’s age, an Eskar Agent must receive and examine from the individual one of the following authorized government issued ID cards: Massachusetts issued driver’s license; Massachusetts issued ID card; Out-of-state driver’s license or ID card (with photo); Passport; or U.S. Military ID. To verify the age of the individual the Agent will use an Age Verification Smart ID Scanner that will be supplied by Eskar. If for any reason the identity of the customer or the validity of the ID is in question, the individual will not be granted access to the facility.

Eskar will train all Retail and Security Agents on the verification and identification of individuals. All Agents will enroll in and complete the Responsible Vendor Training Program when it is available. This curriculum will include: Diversion prevention and prevention of sales to minors; and Acceptable forms of identification, including how to check identification, spotting false identification, provisions for confiscating fraudulent identifications, and common mistakes made in verification.

Eskar will have limited access areas identified with clear signage designating the access point for authorized personnel only, pursuant to 935 CMR 500.110(4). Identification badges will be required to be worn at all times by Eskar employees while at the facility or engaged in transportation. Eskar will positively identify all individuals seeking access to the facility to limit access solely to individuals 21 years or age or older.

While at the facility or transporting marijuana for the facility all Eskar Agents must carry their valid Agent Registration Card issued by the Commission. All Eskar Agents are verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card. All outside vendors, contractors and visitors shall be required to wear visitor badges prior to entering limited access areas and shall be displayed at all times. Visitors shall be logged in and out and be escorted while at the Eskar facility. The visitor log will be available for inspection by the Commission at all times. All visitor badges will be returned to Eskar upon exit.

The following individuals shall be granted immediate access to the facility: Representatives of the Commission in the course of responsibilities authorized by Chapter 334 of the Acts of 2016, as amended by Chapter 55 of the Acts of 2017 or 935 CMR 500.000; representatives of other state agencies in the Commonwealth; emergency responders in the course of responding to an emergency; and law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

All Limited Access areas will be clearly described by the filing of a diagram of the registered premises, as determined by the Commission, reflecting, where applicable, entrances and exits,

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walls, partitions, processing, production, storage, disposal and retail sales areas. Access to Limited Access areas will be restricted to employees, agents or volunteers specifically permitted by Eskar, agents of the Commission, state and local law enforcement and emergency personnel. All Eskar employees will visibly display an employee identification badge issued by Eskar at all times while Eskar's Marijuana Establishments or transporting marijuana.

## **Security Plan**

Eskar Arlington, LLC (“Eskar”) security plan is to protect the premises, provide a safe environment for patients, caregivers, staff, visitors and the general public, and to deter and prevent theft and diversion of product. Eskar recognizes and prepares for both internal and external security threats, all employees will go through security training. Security plans will be reviewed and amended as needed. Violation of security policies by Eskar agents and employees is grounds for immediate dismissal.

Pursuant to 935 CMR 500.110(1)(a)-(q), Eskar will implement sufficient safety measures to prevent unauthorized entrance into the Eskar facility and theft of marijuana from occurring. These security measures include, but are not limited to: properly identifying individuals entering the Eskar facility to limit access to those 21 years or older; preventing loitering; properly disposing of marijuana products; securing entrances and establishing limited access areas for authorized personnel; ensuring proper storage of marijuana and marijuana products; keeping locks in good condition and preventing keys to said locks from being accessible to unauthorized individuals; ensuring property lighting of the exterior of the Eskar facility; keeping marijuana products out of plain site; developing emergency procedures; and sharing Eskar’s security plan and procedures and relevant updates with law enforcement and fire services. If Eskar identifies alternate security provisions that might be regarded as adequate substitutes for any security requirements, Eskar will submit a request for acceptance of these provisions pursuant to 935 CMR 500.110(2).

Eskar will have limited access areas identified with clear signage designating the access point for authorized personnel only, pursuant to 935 CMR 500.110(4). Identification badges will be required to be worn at all times by Eskar employees while at the facility or engaged in transportation. All outside vendors, contractors and visitors shall be required to wear visitor badges prior to entering limited access areas and shall be displayed at all times. Visitors shall be logged in and out and be escorted while at the Eskar facility. The visitor log will be available for inspection by the Commission at all times. All visitor badges will be returned to Eskar upon exit. All Limited Access areas will be clearly described by the filing of a diagram of the registered premises, as determined by the Commission, reflecting, where applicable, entrances and exits, walls, partitions, vegetation, flowering, processing, production, storage, disposal and retail sales areas. Access to Limited Access areas will be restricted to employees, agents or volunteers specifically permitted by Eskar, agents of the Commission, state and local law enforcement and emergency personnel. All Eskar employees will visibly display an employee identification badge issued by Eskar at all times while Eskar’s Marijuana Establishments or transporting marijuana.

All finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft or loss, pursuant to 935 CMR 500.110(1)(f). Additionally, Eskar will prohibit keys, if any, from being left in the locks or stored or place in a location accessible to persons other than specifically authorized personnel. Eskar will also ensure that that all marijuana products are kept out of plain sight and are not visible from a public place without the use of binoculars, optical aids or aircraft.

Pursuant to 935 CMR 500.105(12)(b), all liquid waste containing marijuana or marijuana byproducts shall be disposed of in compliance with all applicable state and federal requirements. Any remaining marijuana waste shall be ground and mixed with other organic materials, as defined in 301 CMR 16.02 and in accordance with 935 CMR 500.105(12)(c)(2.b). Solid waste containing

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cannabis waste generated at our Marijuana Establishment may be ground up and mixed with solid wastes such that the resulting mixture renders the cannabis unusable for its original purpose, in compliance with 935 CMR 500.105(12)(c). A minimum of two Marijuana Establishment Agents must witness and document how the marijuana waste is disposed or otherwise handled in accordance with 935 CMR 500.105(12).

In accordance with 935 CMR 500.110(5), Eskar will have a security system to prevent and detect diversion, theft or loss of marijuana. Pursuant to 935 CMR 500.110(5)(a)-(g), Eskar's security system shall include, but is not limited to: perimeter alarms within its structures; failure notification system; a failure notification system that provides notification of any failure in the surveillance system within five minutes after failure via telephone, email or text message; duress alarm; video cameras in all areas containing marijuana; 24-hour recordings that are retained for at least 90 days, contain a date and time stamp and can be exported as still images; and the ability to remain operational during power outages as a result of a secondary power back-up or gen-set power stream. Eskar will have video cameras in all areas containing marijuana, at all points of entry and exit and in the parking lot. Eskar will have video cameras directed at all safes, vaults and sales areas. All of the cameras shall be angled to identify any person entering or exiting the establishment. Additionally, the security system will be maintained in secure locations with a back-up alarm system provided by a company different than that provided by our primary system. Back-up video storage options include the "cloud" and off-site storage of footage in compliance with section 935 CMR 500.110(5) as noted above. Back-up alarm systems include battery power or diesel-powered generator(s) in case of power failure. Access to said systems will be limited to personnel essential to security operations, law enforcement, the security Eskar and the Commission. All equipment shall be in good working order at all times. All trees, bushes, and other foliage outside the establishment shall be maintained to prevent persons from concealing themselves from sight pursuant to 935 CMR 500.110(5)(g).

In accordance with 935 CMR 500.110(7)(a)(1), an on-site secure locked safe or vault used exclusively for the purpose of securing cash shall be maintained. Video cameras shall be positioned to provide images of areas where cash is kept, handled and packaged for transport to financial institutions or DOR facilities. Eskar shall have a written process for securing cash and ensuring transfers of deposits to its financial intuitions pursuant to 935 CMR 500.110(7)(a)(3). Eskar shall use an armored transport provider that is licensed pursuant to M.G.L. c. 147 §25 and has been approved by the financial institution or DOR facility. Eskar shall ensure the use of a locked bag for the transportation of cash from its facility to a financial institution or DOR facility if approved for an alternative safety measure. Transportation of cash shall be conducted in an unmarked vehicle if approved for an alternative safety measure. If this alternative safety measure is utilized to transport cash, Eskar shall adhere to the following safety measures: two marijuana establishment agents shall be present with the vehicle at all times; the vehicle shall be equipped with real-time GPS tracking, the vehicle shall have a two-way communication with the Eskar facility; marijuana or marijuana products will be prohibited from being transported at the same time as cash is being transported for deposit; and Eskar shall seek approval of the alternative safeguard by the financial institution or DOR facility.

Any incident occurring at the Eskar facility that is a breach of security shall be immediately reported within 24 hours to law enforcement and the Commission, pursuant to 935 CMR 500.110(9). Breaches include, but are not limited to: discovery of discrepancies of inventory; diversion, theft or loss of product; criminal action involving the Eskar facility; unauthorized

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destruction of marijuana or suspicious acts involving said marijuana; loss or alteration of records; and alarm activation or failure of the security system. Incident reports shall be submitted to the Commission within 10 days of the occurrence of the act and documentation of the incident will be maintained for at least one year or throughout the duration of any related investigation.

Eskar will annually obtain a security system audit by a vendor approved by the Commission and at Eskar's expense, pursuant to 935 CMR 500.100(10). Eskar will submit said report within 30 days after the audit is completed and, if areas of concerns are identified, Eskar will submit a mitigation plan to address the issue.

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### **Separating Recreational from Medical Operations**

Eskar Arlington, LLC (“Eskar”) does not intend to sell medical marijuana or marijuana products to registered qualifying patients at this time and does not hold a medical license under 935 CMR 501.000. As a result, Eskar will not need to separate its recreational operations from its medical operations because it will only be conducting retail recreational operations.

### **Storage of Marijuana**

Pursuant to 935 CMR 500.105(11)(a)-(e), Eskar Arlington, LLC (“Eskar”) will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. Eskar will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. Eskar storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest. The Eskar storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

Eskar storage policy dictates that product may only be stored in areas under video surveillance. Only authorized marijuana establishment agents have access to product storage areas, product storage keys, and or access cards. Storage rooms must remain locked at all times except times needed to transfer product. Marijuana establishment agents in product rooms without authorization, or good reason, will be terminated. All product must be returned to storage at the end of processing work orders, or at the end of the business. For processing that takes more than one day, processing area and product must be locked inside an area with adequate security.

Pursuant to 935 CMR 500.105(13)(d), Eskar will transport marijuana products in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products and the storage compartment will be sufficiently secure that it cannot be easily removed. If Eskar plans to transport marijuana products to multiple other establishments in the future, it will seek the Commission’s permission to adopt reasonable alternative safeguards.



### **Transportation of Marijuana**

Pursuant to 935 CMR 500.105(13)(a), Eskar Arlington, LLC (“Eskar”) will only transport marijuana between its licensed Marijuana Establishments and by its registered marijuana establishment agents. All Marijuana Establishments involved in the transportation will ensure that the products are linked to seed-to-sale tracking and any undeliverable product or refused product will be shipped to the originating establishment in accordance with 935 CMR 500.105(13)(a)(5). All vehicles will be staffed by a minimum of two agents, with at least one remaining in the vehicle at all times. Prior to leaving the Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment will weigh, inventory, and account for, on video, all marijuana products to be transported. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest. The product will be weighed and inventoried upon both departure and arrival and a log will be maintained describing any vehicle stops. All routes will be randomized and will be within the Commonwealth.

In accordance with 935 CMR 500.105(13)(c), when transporting marijuana products, not other products will be transported or stored in the same vehicle. Storage and transportation of finished products will be under conditions that will protect them against physical, chemical and microbial contamination as well as against deterioration of finished products or their containers pursuant to 935 CMR 500.105(3)(b)(15).

Eskar will be in compliance with all transportation storage requirements when marijuana products in the vehicle of 935 CMR 500.105(13)(d), including the use of secure, locked storage compartments that are not part of the vehicle transporting the marijuana; and the use of a sufficiently secure storage compartment that cannot be easily removed.

Pursuant to 935 CMR 500.105(13)(b), Marijuana Establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of the discrepancy. Eskar Marijuana Establishment Agents will report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

All Eskar agents involved in transportation of marijuana products will have a drivers license in good standing issued by the Massachusetts Registry of Motor Vehicles and will carry their agent registration card at all times in compliance with 935 CMR 500.105.(13)(g).

In accordance with 935 CMR 500.105(13)(b), Eskar agents will document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities within 24 hours of the discovery of the discrepancy. All vehicles accidents, diversions, losses or other incidents deemed reportable that occur during transport shall be reported within 24 hours.

All vehicles that are used for transport shall comply with 935 CMR 500.105(13)(c). The vehicle used for transportation will be owned or leased by Eskar, properly registered, inspected and insured with the Commonwealth, equipped with a Commission-approved alarm system and have heating

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and cooling systems appropriate for marijuana products. Eskar will use a vehicle to transport marijuana products that contained a GPS monitoring device that is in compliance with 935 CMR 500.105(13)(e). Each Eskar Marijuana Establishment Agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products. The vehicle will not have any markings that indicate the content and marijuana products will not be visible from outside the vehicle. As stated in 935 CMR 500.105(3)(b)(16), all vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Pursuant to 935 CMR 500.105(13)(d), Eskar will transport marijuana products in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products and the storage compartment will be sufficiently secure that it cannot be easily removed.

Eskar will ensure that each vehicle transporting marijuana products will have a GPS monitoring device that complies with 935 CMR 500.105(13)(e). Each Eskar agent transporting marijuana will have access to a secure form of communication and will test said devices prior to and immediately after leaving the originating location. Contact will be made with the originating location every 30 minutes throughout the trip.

Manifests will be completed in accordance with 935 CMR 500.105(13)(f). All transportation manifests shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provided to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transport, pursuant to 935 CMR 500.105(f)(1). Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.

Pursuant to 935 CMR 500.105(13)(f)(3), upon arrival, the agent at the destination establishment shall compare the manifest produced by the agents who transported the marijuana to the copy transmitted by facsimile or email. This manifest must, at a minimum, include: the originating establishment name, address, and license number; the names and registration numbers of the agents who transported the marijuana; the name and registration number of the agent who prepared the manifest; the destination establishment name, address, and license number; a description of the products being transported, including the weight; the mileage of the transporting vehicle at departure from the originating establishment, at the destination, and upon return at the originating establishment; the date and time of departure from originating the establishment and arrival at destination establishment; a signature line for the agent who receives the marijuana products; the weight and inventory before departure and upon receipt; the date and time that the transported products were re-weighed and re-inventoried; the name of the agent at the destination establishment who re-weighed and re-inventoried products; and the transportation vehicle's make, model, and license plate.

The manifest will be maintained within the vehicle during the entire transportation process, until delivery is completed. Eskar will retain all transportation manifests for no less than one year and make them available to the Commission upon request.

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### **Waste Disposal Plan**

Eskar Arlington, LLC, (Eskar) intends to implement the following waste disposal plan. Eskar is located 21 Broadway Street, Arlington, MA 02474.

Eskar will implement waste disposal practices in accordance with 935 CMR 500.105(12). These practices will include ensuring that all recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. All liquid waste containing marijuana or by-products of marijuana processing shall be disposed of in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26 through 53; 314 CMR 3.00: *Surface Water Discharge Permit Program*; 314 CMR 5.00: *Groundwater Discharge Program*; 314 CMR 12.00: *Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers*; the Federal Clean Water Act, 33 U.S.C. 1251 *et seq.*, the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: *Sewer System Extension and Connection Permit Program*), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: *Industrial Wastewater Holding Tanks and Containers*.

All organic material, recyclable material and solid waste generated at Eskar shall be redirected or disposed in the following manners. Organic material and recyclable material shall be redirected from disposal in accordance with the waste disposal bans described in 310 CMR 19.017: *Waste Bans*. To the greatest extent feasibly any recyclable material as defined in 310 CMR 16.02: *Definitions* shall be recycled in a manner approved by the CCC; and any remaining marijuana waste shall be ground and mixed with other organic material as defined in 310 CMR 16.02: *Definitions* such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation in compliance with the requirements of 310 CMR 16.00: *Site Assignment Regulations for Solid Waste Facilities*. Solid waste containing cannabis waste generated at Eskar may be ground up and mixed with solid wastes such that the resulting mixture renders the cannabis unusable for its original purposes. Once such cannabis waste has been rendered unusable, it may be brought to a solid waste transfer facility or a solid waste disposal facility that holds a valid permit issued by the Department of Environmental Protection.

No fewer than two Eskar registered marijuana establishment agents must witness and document how the marijuana waste is disposed or otherwise recycled, composted or handled in accordance with 935 CMR 500.105(1). While marijuana products or waste is disposed or handled, Eskar and its agents must create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or handling, the location of the disposal or other handling, and the names of the two marijuana establishment agents present during the disposal or other handling, with their signatures. Eskar will keep and maintain these records for at least three years unless automatically extended for the duration of any enforcement action or extended by an order of the Commission.



**Doc Number:** ESK-SEC-NB-SOP-513  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Marijuana Product Storage Procedures SOP

### 1. PURPOSE

The purpose of the Marijuana Product Storage Procedures is to instruct Eskar employees on how to properly store marijuana product(s) within the designated storage areas.

### 2. SCOPE

This document will outline the different storage areas within Eskar's Showroom and Vault.

### 3. DEFINITIONS

**Vault** - means a secured, limited access storage room within a Marijuana Establishment that is outfitted with adequate security features for the purposes of storing Marijuana or Marijuana Products or cash. A vault must be adequately sized to store inventory that is not being actively handled for purposes of dispensing, packaging, processing or transportation.

### 4. RESPONSIBILITIES

Directors and Managers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- Cannabis Control Commission (CCC)
- Massachusetts Department of Public Health (DPH)
- OSHA
- Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
N/A	N/A

### 6. PROCEDURE

#### 935 CMR 500.105(11)

(a) A Marijuana Establishment shall provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

(b) A Marijuana Establishment shall have separate areas for storage of Marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed.

(c) Marijuana Establishment storage areas shall be maintained in a clean and orderly condition.



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**Version:** 1.0

**Supersedes:** Initial Release

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(d) Marijuana Establishment storage areas shall be free from infestation by insects, rodents, birds, and pests of any kind.

(e) Marijuana Establishment storage areas shall be maintained in accordance with the security requirements of 935 CMR 500.110.

### **Common Scenarios**

- Opening/Closing the Dispensary (pulling product to the POS Checkout Vestibule before opening and throughout the business day and putting product away at the end of the business day).
- Receiving a wholesale order.
- Daily/Weekly Audit.
- Commission Inspection.
- Quarantine or Recall.

### **Usable Marijuana Product Storage Procedures**

The Vault is where all finished marijuana products will be stored at Eskar. Two additional storage areas will be behind the POS Counter(s) and within the lockable display cases. Eskar will take all necessary steps needed to always ensure the Vault and other storage areas are sanitary, neat, and orderly. The Vault will be deep-cleaned on a weekly basis by an appointed Eskar employee. Only members of the Management Team will have access to the Vault and Display Cases. Eskar employees will need assistance from Management when entering the Vault. The Vault will include:

1. Multiple shelving units;
2. Lockable Refrigerator; and
3. Lockable Quarantine Cage.

### **Marijuana Product Storage Information**

**Bulk Flower:** All bulk flower (big bud, popcorn, and trim) will be kept in their original shipping bag/container in which the licensed grower delivered the marijuana product in. Bulk flower will be stored on the shelving units within the Vault. All bags/containers will be labeled with the appropriate Harvest Batch ID Number and Sales Package RFID Number.

**Pre-Packaged Flower:** All pre-packaged flower (dram bottles or pre-rolled joints) will be kept in their original shipping bag/container in which the licensed grower delivered the marijuana product in. Pre-packaged flower will be stored on the shelving units located within the Vault. All bags/containers will be labeled with the appropriate Harvest Batch ID Number and Sales Package RFID Number.

**Concentrate/Extracts:** All concentrates, vaporizer cartridges, disposable pens, and fills will be kept in their original shipping bag/container in which the licensed processor delivered the marijuana product in. All concentrates will be stored on the shelving units located within the Vault. All bags/containers will be labeled with the appropriate Production Batch Number and Sales Package RFID Number.



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**Edibles:** All edibles will be kept in their original shipping bag/container in which the licensed processor delivered the marijuana product in. All concentrates will be stored on the shelving units located within the Vault. All bags/containers will be labeled with the appropriate Production Batch Number and Sales Package RFID Number. Any edibles that require refrigeration will be placed in the lockable refrigerator within the Vault.

**Infused Products:** All infused products (topicals and tinctures) will be kept in their original shipping bag/container in which the licensed processor delivered the marijuana product in. All infused products will be stored on the shelving units located within the Vault. All bags/containers will be labeled with the appropriate Production Batch Number and Sales Package RFID Number.

### **POS/Order Fulfillment Marijuana Product Storage Procedures**

The POS Checkout and Fulfillment Vestibule will hold marijuana products to be sold to consumers. There are designated storage areas within the POS Checkout Area where flower, edibles, infused products, and concentrates will be organized, stored, and replaced during normal business hours. The purpose of storing marijuana products in the POS Checkout Vestibule is so Eskar employees can seamlessly and directly retrieve products ordered by a consumer during sales transactions.

When opening the Dispensary, employees will be responsible for ensuring all available marijuana products for sale are organized and placed in their correct storage bin within the POS Checkout Vestibule Area. There will be storage bins and rolling racks for each batch or lot of marijuana product and all storage bins and rolling racks will be accurately labeled with the correct product name (Harvest or Production Batches will never be mixed). Eskar employees will ensure the quantity of each marijuana product brought from the Vault within the POS Checkout Vestibule matches the required par level (all marijuana products available for sale will have par levels assigned to better control inventory levels. Assigning par levels will also help prevent any sort of delay in any sales transactions due to running low on available product). When closing the Dispensary, employees will be responsible for obtaining all marijuana products remaining in the POS Checkout Vestibule and will place the products back in the Vault in their respective storage areas.

Employees assigned to the POS Checkout Area will meet with Management before moving marijuana products from the Vault to the POS Checkout Vestibule. This meeting will be conducted at the beginning of each day and provides the opportunity for Management to be on the same page with all employees regarding product inventory levels.

All marijuana product(s) will be segregated by product category (Flower, Concentrate, Edibles, and Infused Products) as well as product type and product brand (specific brand of processor or grower).

There will be one container designated for any/all returned products (both marijuana and non-marijuana products). Management will be responsible for obtaining any returned material to dispose of the product(s) or quarantine the product(s).

Management will work with all employees and help monitor and replenish marijuana products as needed. Management will ensure all marijuana product storage containers are labeled correctly and will monitor which marijuana products are running low in the Vault so that employees working the floor

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**Supersedes:** Initial Release

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understand which marijuana products may sell out within that specific business day (employees will also be able to check and see if any marijuana products are running low via the POS Software).

**7. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

**8. DOCUMENT APPROVALS:**





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**POLICY REGARDING PLAN REVIEW APPLICATION FOR FOOD  
ESTABLISHMENTS**

When a plan is required as designated in the 1999 FDA Food Code, Section 8-201.11, sub-sections A-C, said plan shall be reviewed and signed by a Registered Sanitarian (REHS/RS) or NEHA Certified Professional in Food Safety (CP-FS) prior to submission to the Office of the Board of Health for approval. The aforementioned signature shall attest to the proper and sanitary design of the proposed food establishment and compliance with section 8-201.12, sub-sections A through F of the 1999 FDA Food Code.

Failure to submit plans that have been signed by a currently and validly credentialed professional as described above may result in denial of approval of said plans. Proof of registration or certification must accompany the Plan Review Application.

This policy shall take effect on January 1, 2013.

**STATEMENT OF PURPOSE**

As authorized by the 1999 FDA Food Code, Section 8-102.10, sub-sections A and B, the Board of Health has adopted this requirement to further safeguard public health by ensuring food is safe and unadulterated through the proper and sanitary design of new and remodeled food establishments. The proper and sanitary design of a food establishment is necessary for long-term sustained compliance with the Food Code and prevention of the transmission of foodborne disease.

Whereas persons with REHS/RS and/or CP-FS credentials have a verified combination of relevant credible experience and/or a related academic degree, and have met specified food safety knowledge standards as defined by a nationally recognized organization, they are in a position to design plans for safely conducting a food operation, which will support a comprehensive and uniform plan review process.

**DIRECTORY OF PERSONS QUALIFIED TO CERTIFY PLAN REVIEW APPLICATION**

The listing below was compiled as a convenience to provide assistance complying with the Arlington Board of Health Policy requiring all Plan Review Applications for Food Establishments be reviewed and signed by a person possessing an RS/REHS or CP-FS. This listing is in no way comprehensive and does not preclude any person with the necessary credentials from satisfying the requirement. The Board of Health does not in any way endorse or recommend any of the individuals or organizations listed below, nor does the Board evaluate the services or guarantee the success of the services offered by those listed below. Although the listing is periodically updated, there is no guarantee all information is current. *Updated May 23, 2016.*

Berger Food Safety Consulting  
Boston, MA  
(617) 445-1647  
[info@servingsafefood.com](mailto:info@servingsafefood.com)

Sweet Safe, Inc.  
Bridget Sweet  
Wayland, MA  
(774) 434-5146  
[bridget@sweetsafeinc.com](mailto:bridget@sweetsafeinc.com)

Jacqueline McKenna-Dalton  
Millis, MA  
(781) 267-3985  
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Ruth I. Jones  
Quincy, MA  
(617) 376-1286

Joanne Lee  
Boston, MA  
(617) 645-5291

Cindy Rice  
Eastern Mass Food Safety  
(781) 356-1467  
[cindy@easternfoodsafety.com](mailto:cindy@easternfoodsafety.com)

Pamela Ross-Kung  
Ross-Kung Management Consultants  
Stoneham, MA  
(617) 523-5450  
[prosskung@safefoodmanagement.com](mailto:prosskung@safefoodmanagement.com)

Alfred Scoglio  
ALSCO Food Check Group  
Plymouth, MA  
(508) 746-9353  
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Town of Arlington  
Department of Health and Human Services  
Office of the Board of Health  
27 Maple Street  
Arlington, MA 02476

Tel: (781) 316-3170  
Fax: (781) 316-3175

## FOOD ESTABLISHMENT PLAN REVIEW APPLICATION

*These guidelines are not final requirements. The Board of Health may require additional information based on the type of operation and menu.*

       NEW        ✓   REMODEL             CHANGE OF TYPE OF SERVICE

Plan Review Fee: \$150.00 (checks made payable to: Town of Arlington)

PROJECTED CONSTRUCTION DATE 8/15/2021      PROJECTED OPENING DATE 2/15/2022

ESTABLISHMENT NAME Esicar Arlington

ADDRESS 23 Broadway, Arlington, MA

CONTACT PERSON/ TITLE Michael Hunnewell, Owner

CONTACT NUMBER 781-697-9323

CONTACT ADDRESS 56 New Haven St, Boston, MA 02132

Please be advised this Office requires **30-days to review a completed Plan Review Application**. This Office will issue a letter indicating approval or denial of the Plan Review Application. No work shall begin in an establishment without written approval from this Office. **This Office may return or deny incomplete Plan Review Applications.** No application will be accepted without the required fee.

### PLAN REVIEW STEPS:

- Submit Plan Review Application and plan review fee
- Wait for approval/denial letter from this Office
- Once plans have been approved- construction/renovations can begin in establishment
- Once construction is completed, contact this Office for a pre-operational inspection- No food is permitted in the establishment until approved by this Office.
- Upon successful pre-operational inspection- complete the permit application and pay annual permit fee depending on category number (determined by this Office)
- Once annual permit fee is paid, a permit will be issued. Permits expire December 31<sup>st</sup> of each year.

Questions regarding this application can be directed to:

Natasha Waden  
Health Compliance Officer  
781-316-3170



Name of Establishment Eskar Arlington

Address: 23 Broadway Phone# 781-697-9323

Name of Owner: Michael Hunnewell

Telephone: (781) 697 9323 Email mike.r.hunnewell@gmail.com

Applicant's Name and Title:

Michael Hunnewell, Owner

Mailing Address: 56 New Haven St, Boston, MA 02132

Telephone: (781) 697 9323

Type of service:

(Check all that apply)

- ☐ Sit down Meals  
☐ Take Out  
☐ Caterer  
☐ Mobile Vendor  
☒ Retail (packaged food)  
☒ Other

Primary language (s) spoken in establishment English

Name(s) of Certified Food Manager: N/A

(Attach copy of certificate) Effective February 1, 2010 certified manager must also have allergen awareness certificate.

Number of floors on which operations are conducted 1

Is a scale used to weigh food for resale?

YES / NO

Number of seats: N/A

Total square ft. of establishment: 1973

Number of staff: 12 (Max per shift)

Hours of operation:

11am-7pm Sun 11am-7pm Mon 10am-8pm Tue

10am-8pm Wed 10am-8pm Thurs 10am-8pm Fri 10am-8pm Sat

Approximate number of meals to be served: N/A

           Breakfast            Lunch            Dinner            Other

The following documents must be included for this application to be considered complete:

- A \$150.00 non-refundable plan review fee made payable to the Town of Arlington.
- Proposed Menu (including seasonal, off-site, and banquet menus)
- Menu must include consumer advisory if establishment is serving raw, undercooked foods of animal origin or foods that are not otherwise processed to eliminate disease-causing organisms.

Consumer Advisory Example:

Menu		
*Hamburger		*Sirloin Steak
*Eggs		*Sushi
*These items may be served raw or undercooked. Consuming raw or undercooked meats, poultry, seafood, shellfish or eggs may increase your risk of foodborne illness.		

- Effective October 1, 2010- food establishment cooking, serving or preparing food intended for immediate consumption either on or off the premises must include the following Allergen Awareness Statement on the menu and menu board: "Before placing your order, please inform your server if a person in your party has a food allergy".
- Manufacturer Specification sheets for each piece of equipment shown on the plan
- Site plan showing location of business in building; location of building on site including alleys, streets; and location of any outside equipment (dumpsters, etc)
- Floor plan drawn to scale of the food establishment showing the location of equipment, plumbing, electrical services and mechanical ventilation.
  - Plans must be a minimum of 11 x 14 inches in size
  - Drawn to a minimum of 1/4 inch= 1 foot.
  - Show location of all food equipment
  - Each piece of equipment must be clearly labeled with its common name.
  - Include all areas such as storage rooms, garbage rooms, toilets, basements and/or cellars used for storage or food preparation. Show all features of these rooms as required by this plan review.
- Adequate number of clearly designated hand washing lavatories for each toilet fixture and in food preparation areas.
- Provide the room size, aisle space, space between and behind equipment and the placement of the equipment on the floor plan.

I have submitted plans/applications to the following authorities on the following dates:

Board of Selectmen  
9/3/2020 Zoning  
 Planning  
3/18/2021 Building  
 Plumbing

Electric  
 Police  
5/21/2021 Fire  
 Other

### FOOD PREPARATION REVIEW

Check categories of Potentially Hazardous Foods (PHF's) to be handled, prepared and served.

CATEGORY	YES	NO
Thin meats, poultry, fish, eggs (hamburger, sliced meats, fillets)		✓
Thick meats, whole poultry (roast beef; whole turkey, chickens, hams)		✓
Cold processed foods (salads, sandwiches, vegetables)		✓
Hot processed foods (soups, stews, rice, noodles, gravy, chowders, casseroles)		✓
Bakery goods (pies, custards, cream fillings & toppings)		✓
Other- specify		✓

### CIRCLE/ANSWER THE FOLLOWING QUESTIONS:

1. Are all food supplies from inspected and approved sources?

YES / NO

Provide name of food supplier(s): Suppliers not selected yet.

Some potential vendors include: Revolutionary Clinics, Sira Naturals, and Coast Cannabis Co.

2. What are the projected frequencies of deliveries for Frozen foods none, refrigerated foods once a week, and Dry goods once a week.

3. Provide information on the amount of space (in cubic feet) allocated for:

Dry storage 910 cu ft

Refrigerated Storage 25 cu ft

Frozen Storage \_\_\_\_\_

4. How will dry goods be stored off the floor?

In a vault with key card access and multiple HD security cameras

### COLD STORAGE:

1. Is adequate and approved freezer and refrigeration space available to store frozen foods frozen, and refrigerated foods at 41°F (5°C) and below?

YES / NO

Number of refrigeration units: 1

Number of freezer units: 0

2. Will raw meats, poultry, and seafood be stored in the same refrigerators and freezers with cooked/ ready-to-eat foods?

YES / NO

If yes, how will cross-contamination be prevented?

3. Does each refrigerator/ freezer have a thermometer?

YES / NO



**THAWING FROZEN POTENTIALLY HAZARDOUS FOOD:**

N/A no frozen foods

Indicate by checking the appropriate boxes how frozen potentially hazardous foods (PHF's) in each category will be thawed. More than one method may apply. Also, indicate where thawing will take place.

THAWING	*THICK FROZEN FOODS	* THIN FROZEN FOODS
Refrigeration		
Running Water less than 70°F (21°C)		
Microwave (as part of cooking process)		
Cooked from Frozen State		
Other (describe)		

\*Frozen foods: approximately one inch or less = thin, and more than an inch= thick

**COOKING:**

N/A

1. Will food thermometers be used to measure final cooking/reheating temperatures of PHF's? YES / NO
2. What style of temperature measuring device will be used: \_\_\_\_\_
3. When will food product thermometers be calibrated \_\_\_\_\_
4. What method will be used for calibration: \_\_\_\_\_
5. List cooking equipment: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**HOT/COLD HOLDING:**

N/A

1. How will hot PHF's be maintained at 140°F (60°C) or above during holding for service? Indicate the type and number of hot holding units. \_\_\_\_\_  
\_\_\_\_\_
2. How will cold PHF's be maintained at 41°F or below during holding for service? Indicate the type and number of cold holding units. \_\_\_\_\_  
\_\_\_\_\_

**COOLING:** N/A

Indicate by checking the appropriate boxes how PHF's will be cooled to 41°F (5°C) within 6 hours (140°F to 70°F in 2 hours and 70°F to 41°F in 4 hours). Also, indicate where the cooling will take place.

Cooling Method	Thick Meats	Thin Meats	Thin Soups/ Gravy	Thick Soups/ Gravy	Rice/ Noodles
Shallow Pans					
Ice Baths					
Reduce Volume or Size					
Rapid Chill					
Other (describe)					

**REHEATING:** N/A

1. How will PHF's that are cooked, cooled, and reheated for hot holding be reheated so that all parts of the food reach a temperature of at least 165°F for 15 seconds. Indicate type and number of units used for reheating foods. \_\_\_\_\_

2. How will reheating food to 165°F for hot holding be done rapidly and within 2 hours? \_\_\_\_\_

**PREPARATION:** N/A all edibles prepackaged and sealed

1. List foods prepared more than 12 hours in advance of service. \_\_\_\_\_

2. Will food employees be trained in good food safety practices? N/A YES / NO  
Number (s) of employees: \_\_\_\_\_  
Dates of completion: \_\_\_\_\_



3. How will this establishment prevent bare-hand contact with ready-to-eat foods?

N/A All edibles prepackaged and sealed

**EFFECTIVE OCTOBER 1, 2010**

4. Will the Allergen Awareness poster be displayed in the employee work area? YES / NO

Poster can be found at: <http://www.foodallergy.org/page/restaurant-poster>.

5. Is there a written policy to exclude or restrict food workers who are sick or have infected cuts and lesions?

YES / NO

Describe briefly:

6. Will ingredients for cold ready-to-eat foods such as tuna, mayonnaise and eggs for salads and sandwiches be pre-chilled before being mixed and/or assembled?

N/A  
YES / NO

If not, how will ready-to-eat foods be cooled to 41°F?

7. Will all produce be washed on-site prior to use?

Is there a location planned for washing produce?

Describe:

N/A

YES / NO

YES / NO

8. Describe the procedure for minimizing the length of time PHF's will be kept in the temperature danger zone (41°F- 140°F) during preparation.

N/A

**FINISH SCHEDULE**

Indicate which materials (quarry tile, stainless steel, 4" plastic coved molding, etc.) will be used in the following areas:

	Floor	Coving	Walls	Ceiling
Kitchen N/A				
Bar N/A				
Food storage	Cement	Stainless steel	sheetrock	wood/plaster
Other storage				
Bathrooms	Cement	porcelain tile	tile/sheetrock	wood/plaster
Dressing rooms N/A				
Ware washing N/A				
Walk-in refrigerators & freezers N/A				
Other- describe				

**INSECT AND RODENT CONTROL**

Please check the appropriate boxes and answer questions as necessary.

	YES	NO	NA
1. Will all outside doors be self-closing and rodent proof?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are all screen doors provided on all entrances left open to the outside?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Do all openable windows have a minimum of #16 mesh screening?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Is the placement of electrocution devices identified on the plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Will all pipes & electrical conduit chases be sealed; ventilation systems exhausts and intakes protected?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Is the area around the building clear of unnecessary brush, liter, boxes and other harborage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Will air curtains be used? If yes, where? _____	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Provide the name of pest control company to be used at this establishment: Mantis Pest Control

## GARBAGE AND REFUSE

INSIDE	YES	NO	NA
1. Do all containers have lids?	✓		
2. Will refuse be stored inside?			
If so, where <u>green waste vault, emptied daily</u>	✓		
3. Is there an area designated for garbage can or floor mat cleaning?	✓		
OUTSIDE			
4. Will a dumpster be used?			
Number <u>1</u> Size <u>4 yard</u>			
Frequency of pick up <u>Weekly</u>			
Contractor <u>Casella Waste Systems</u>			
5. Will garbage cans be stored outside?		✓	

6. Describe surface and location where dumpster/compactor/garbage cans are to be stored  
Quarantine/green waste will be stored in the vault until destroyed/rendered unusable. Recycling will be kept in storage area. Dumpster will be on back corner of the building

7. Describe the location of grease storage receptacles

N/A

8. Is there an area to store recycled containers?

Indicate what materials are required to be recycled:

(✓) Glass

(✓) Metal

(✓) Paper

(✓) Cardboard

(✓) Plastic

9. Is there an area to store returnable damaged goods?

YES / NO

## PLUMBING CONNECTIONS

	Air Gap	Air Break	Integral Trap	"P" Trap	Vacuum Breaker	Condensate Pump
Toilet			✓			
Urinals N/A						
Dishwasher N/A						
Garbage Grinder N/A						
Ice Machine N/A						
Ice Storage Bin N/A						
Mop Sink N/A						
Janitor Sink N/A						
Hand Wash Sink				✓		
3 Compartment Sink N/A						
2 Compartment Sink N/A						
1 Compartment Sink N/A						
Water station N/A						
Steam tables N/A						
Dipper wells N/A						
Refrigeration Condensate/ Drain lines N/A						
Hose Connection N/A						
Potato Peeler N/A						
Beverage Dispenser w/ Carbonator N/A						
Other N/A						

1. Are easily cleanable floor drains provided? If so, indicate location(s):

No



### WATER SUPPLY

1. Is water supply public (✓) or private ( )?
2. If private, has source been approved? YES / NO  
Please attach copy of written approval and/or permit.
3. Is ice made on premises ( ) or purchased commercially ( )?  
If made on premise, are specifications for the ice machine provided? N/A YES / NO  
Describe location for ice scoop storage: \_\_\_\_\_

### SEWAGE DISPOSAL

1. Is the building connected to municipal sewer? YES / NO
2. If no, is private disposal system approved? YES / NO  
Please attach copy of written approval and/or permit.
3. Are grease traps provided? YES / NO  
If so, where? N/A  
Provide a schedule for cleaning & maintenance \_\_\_\_\_  
Location for grease storage after cleaning \_\_\_\_\_  
Name of offal hauler \_\_\_\_\_

### DRESSING ROOMS

1. Are dressing rooms provided? YES / NO
2. Describe storage facilities for employees' personal belongings (i.e., purse, coats, boots, umbrellas, etc.): Storage available in back office area for employees and possibly bike storage area

### GENERAL

1. Are insecticides stored separately from cleaning & sanitizing agents? YES / NO  
Indicate location: Sanitizing agents will be isolated in storage cabinet with accompanying SDS binder
2. Are all toxics for use on the premise or for retail sale (including personal medications), stored away from food preparation and storage areas? YES / NO
3. Are all containers of toxics including sanitizing spray bottles clearly labeled? YES / NO
4. Will linens be laundered on site? YES / NO  
If yes, what will be laundered and where? \_\_\_\_\_  
If no, how will linens be cleaned? \_\_\_\_\_

5. Is a laundry dryer provided? YES / NO
6. Location of clean linen storage: N/A
7. Location of dirty linen storage: N/A
8. Are food-grade containers provided to store bulk food products? YES / NO  
Indicate type N/A

9. Indicate all areas where exhaust hoods are installed: N/A

Location	Filters &/or Extraction Devices	Square Feet	Fire Protection	Air Capacity CFM	Air Makeup CFM

10. How is each listed ventilation hood system cleaned? N/A

11. Provide name of professional ventilation cleaning company who will inspect and clean ventilation system at least every 6 months:

N/A

### SINKS

1. Is a mop sink present? YES / NO
2. If no, please describe facility for cleaning of mops and other equipment:  
Saniters closet provided in base build, 1st floor
3. If the menu dictates, is a food preparation sink present? N/A YES / NO

### DISHWASHING FACILITIES

1. Will sinks or a dishwasher be used for ware washing? N/A  
Dishwasher ( )  
Three compartment sink ( )
2. Type of sanitation used in dishwasher? N/A  
Hot water (temp. provided)  
Booster heater  
Chemical type

3. Is ventilation provided? *N/A* YES / NO
4. Do all dishwashers have template with operating instructions? *N/A* YES / NO
5. Do all dishwashers have accurate temperature / pressure gauges as required? *N/A* YES / NO
6. Does the largest pot and pan fit into each compartment of the pot sink?  
If no, what is the procedure for manual cleaning and sanitizing? *N/A* YES / NO
- 

7. Are there drain boards on both ends of the pot sink? *N/A* YES / NO
8. What type of sanitizer is used for food contact surfaces?  
Chlorine ( ) Hot Water ( )  
Iodine ( ) Other ( ) *N/A*  
Quaternary ammonium ( )
9. Are test papers and/or kits available for checking sanitizer concentration? YES / NO

#### HAND WASHING / TOILET FACILITIES

1. Is there a hand washing sink in each food preparation and ware-washing area? *N/A* YES / NO
2. Do all hand washing sinks, including those in the restrooms, have a mixing valve or combination faucet? YES / NO
3. Do self-closing metering faucets provide a flow of water for at least 15 seconds without the need to reactivate the faucet? *N/A* YES / NO
4. Is a hand cleanser available at all hand-washing sinks? YES / NO
5. Are hand-drying facilities (paper towels, air blowers, etc.) available at all hand-washing sinks? YES / NO
6. Are covered waste receptacles available in each restroom? YES / NO
7. Is hot and cold running water under pressure available at each hand-washing sink? YES / NO
8. Are all bathroom doors self-closing? YES / NO
9. Are all bathrooms equipped with adequate ventilation? YES / NO
10. Is a hand washing sign posted at all hand washing sinks? YES / NO

**SMALL EQUIPMENT REQUIREMENTS**

1. Specify the number, location, and types of each of the following:

N/A

Slicers: \_\_\_\_\_

Cutting Boards: \_\_\_\_\_

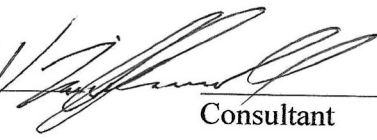
Can Openers: \_\_\_\_\_

Mixers: \_\_\_\_\_

Floor mats: \_\_\_\_\_

Other: \_\_\_\_\_

Statement: I hereby certify that the above information is correct, and I fully understand that any deviation from the above without prior permission from the Office may void Plan Review Application approval.

Michael Hunnewell /  \_\_\_\_\_  
Owner Consultant

Date 7/15/2021 \_\_\_\_\_ Date \_\_\_\_\_

**Please attach contact information and proof of a current REHS/RS or CP-FS credential for consultant reviewing Plan Review Application as necessitated by the enclosed policy.**

Approval of this Plan Review Application by the Arlington Board of Health does not indicate compliance with any other local, State or Federal code, law, or regulation that may be required. Further, it does not constitute endorsement or acceptance of the completed establishment as constructed and equipped. A pre-operational inspection of the establishment will be conducted prior to operation to determine compliance with local and State laws governing food service establishments. **Pre-operational inspections must be scheduled at least 7 days in advance.**





**Doc Number:** ESK-DSP-AR-FRM-029

**Effective Date:** 07/12/2021

**Version:** 1.0

**Supersedes:** Initial Release

## Cash Deposit Record Form

Date	Cash Bag Identifier	Deposit Total	Eskar Employee Name	Eskar Employee Signature	Cash Transport Representative Signature

**Deposit Pick-Up Date:** \_\_\_\_\_

**Pick-Up Start Time:** \_\_\_\_\_

**Pick-Up End Time:** \_\_\_\_\_

**Pick-Up Total Deposit Amount:** \_\_\_\_\_

**Eskar Manager Signature:** \_\_\_\_\_



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**Description:** Cash Deposit Record Form

**Effective Date:** XX/XX/XXXX

**Doc Number:** ESK-DSP-AR-FRM-029

**Supersedes:** Initial Release

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**1. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
Michael Hunnewell	Initial Release	1.0	07/12/2021

**2. DOCUMENT APPROVALS:**



**Doc Number:** ESK-DSP-AR-FRM-030

**Effective Date:** 07/15/2021

**Version:** 1.0

**Supersedes:** Initial Release

## Cash Drop Closing Report

**Date:** \_\_\_\_\_

**Employee Name:** \_\_\_\_\_

**Till Number:** \_\_\_\_\_

### Mid-Shift Cash Drop

Currency	Quantity	Total	Employee Name	Managers Initials
\$0.01				
\$0.05				
\$0.10				
\$0.25				
\$1.00				
\$5.00				
\$10.00				
\$20.00				
\$50.00				
\$100.00				
Other				
<b>Total</b>				



**Description:** Cash Drop Closing Report  
**Doc Number:** ESK-DSP-AR-FRM-030

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

**End of Day Cash Drop**

Currency	Quantity	Total	Employee Name	Managers Initials
\$0.01				
\$0.05				
\$0.10				
\$0.25				
\$1.00				
\$5.00				
\$10.00				
\$20.00				
\$50.00				
\$100.00				
Other				
<b>Total</b>				



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**Description:** Cash Drop Closing Report  
**Doc Number:** ESK-DSP-AR-FRM-030

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

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**1. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
Michael Hunnewell	Initial Release	1.0	07/12/2021

**2. DOCUMENT APPROVALS:**



**Doc Number:** ESK-DSP-AR-FRM-031  
**Version:** 1.0

**Effective Date:** 07/12/2021  
**Supersedes:** Initial Release

## Financial Hardship Form

**Date:** \_\_\_\_\_

**Consumer Name:** \_\_\_\_\_  
**Date of Birth:** \_\_\_\_\_

\_\_\_\_\_ Confirmation of MassHealth confirmation or redetermination letter for the current year.  
*\*Eskar doesn't accept MassHealth Managed Care or MassHealth Cards.*

\_\_\_\_\_ SSI benefit confirmation letter for the current year  
*\*Social Security Benefit Disability Insurance doesn't qualify.*

\_\_\_\_\_ State and Federal Tax Return Documentation from current year or year prior.

\_\_\_\_\_ SNAP Electronic Benefit Transfer (EBT) statement from the current year.  
*\*Submitting a Department of Transitional Assistance card doesn't qualify for a fee waiver.*

### 1. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
Michael Hunnewell	Initial Release	1.0	07/12/2021

### 2. DOCUMENT APPROVALS:



**Doc Number:** ESK-DSP-AR-SOP-100  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Multilingual Communication & Educational Materials Procedures SOP

### 1. PURPOSE

To ensure all Eskar employees are aware of the translation tools used for consumers that may not speak english, or have hearing and/or sight impairments.

### 2. SCOPE

This procedure applies to all Eskar employees and will help in aiding consumers who consider English to be a second language by using Google Translate. This application can also be used for people who are hearing impaired. Certain educational materials and pamphlets will be made available in braille.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
N/A	N/A

### 6. PROCEDURE

In accordance with 935 CMR 501.140(6): A Marijuana Retailer shall make available educational materials about Marijuana Products to Consumers. A retailer shall have an adequate supply of current educational material available for distribution. Educational materials shall be available in commonly spoken languages designated by the Commission, which will include, but not be limited to, appropriate materials for the visually- and hearing-impaired.

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## **Language Translation Procedures**

When a consumer needs help with english translation, Eskar employees shall:

1. Obtain an iPad from the Showroom.
  - a. Enter the password 000000.
2. Select the “Google Translate” icon.
3. Along the top of the application, tap the language on the upper left side if not set to the desired language. A pull down menu will appear.
  - a. The language choice on the left side will be the language you want translated to the language on the right.
4. The speaker icon located in the middle will allow for the consumer to speak into the iPad and translate into the desired language.
5. Selecting the “X” icon on the upper right-hand side of the application will clear the conversation and allow a new sentence to be translated.
6. Below the area where you can type in text for the application to translate, you will see icons horizontally aligned. These are additional options for translation from an originating language to a desired language for a consumer.
7. The camera icon will allow you to translate printed text into translated text. Hover the camera over the printed text. Once you allow the application to view the translation in real-time you will be able to see the translated text over-top the original printed text.
8. The speaker icon in the center of the options will allow you to speak into the microphone of the iPad. The application will then translate your spoken language into the desired language for the consumer.
9. The icon located on the far-right side of the application will allow you to write out text for the application (handwritten) to translate into typed text for the consumer(s).

## **Communication Procedures for Visibly and Hearing Impaired**

### Visibly Impaired

1. Eskar employee’s verbally speak to the consumer(s) 1-1 throughout the entire shopping experience.

### Hearing Impaired

1. Google App geared towards turning content into sign language messages.
2. Video on Eskar’s website explaining key processes for consumers.
3. Deaf Inc - Training to businesses who want to complete their cultural awareness towards deaf, blind, etc.





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**Doc Number:** ESK-DSP-AR-SOP-100  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

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**7. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

**8. DOCUMENT APPROVALS:**



**Doc Number:** ESK-DSP-AR-SOP-101  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Training Curriculum Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's internal employee training curriculum.

### 2. SCOPE

This document will outline Eskar's internal New Hire Orientation training standards, annual continuous standards, Responsible Vendor training standards, as well as a review of the Employee Training Log.

### 3. DEFINITIONS

**Advanced Core Curriculum** - means the advanced training curriculum taught by a Responsible Vendor Trainer that may be taken by Marijuana Establishment Agents after completing the Basic Core Curriculum under 935 CMR 500.105(2)(b).

**Basic Core Curriculum** - means the foundational training curriculum required of all Marijuana Establishment Agents taught by a Responsible Vendor Trainer under 935 CMR 500.105(2)(b).

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DOC-AR-FRM-016	Master Document List
ESK-DOC-AR-FRM-017	Training Matrix
ESK-COM-AR-FRM-026	Employee Training Form

### 6. PROCEDURE

#### New Hire Training Procedures

935 CMR 500.105(2) - Eskar Ownership and Management Team shall ensure that all Eskar employees complete all necessary training based off of their job title prior to performing job functions. At a minimum, Eskar's training curriculum must include training on confidentiality, privacy, security and

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**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

other topics as specified by the Cannabis Control Commission (CCC). Eskar employees that use Metrc must receive training from the Metrc Beginners & Advanced Retail Class. At a minimum, staff shall receive eight hours of ongoing training annually.

935 CMR 500.105(9)(d)2.d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters

**Eskar's New Hire Training Curriculum will include:**

Week One

Observation with designated Eskar employee(s) covering all key areas of the Dispensary Operations, including a class training session conducted by the General Manager or Assistant Manager(s) covering company policy & procedures, compliance, security, Metrc (if applicable) and the pharmacology of marijuana.

Week Two

The second set of training will entail specific hands-on training covering all key areas of the Dispensary Operations. New hires will be assigned to different stations that will be utilized under their job titles and review applicable SOPs and Forms & Logs that apply to each facet of the operation.

Week Three

The third week will entail working independently within the store in order to demonstrate proficiency in all areas of Dispensary Operations, with all relevant SOPs signed off on by the conclusion of the week.

**Responsible Vendor Training Procedures**

All Eskar employees will be trained by Eskar's 3rd-party Responsible Vendor Training within 90-days of their hire date. All training certification forms will be stored in the appropriate employee personnel file.

**Continuous Annual Training Procedures**

1. In accordance with 935 CMR 500.105(2)(a)4: "At a minimum, staff shall receive eight hours of ongoing training annually."
2. All continuous training will be documented on the bottom portion of the Employee Training Log.
3. Examples of continuous training includes, but it not limited to:
  - a. Hosting training presentations on various subjects such as Health & Safety, Security, Chemical Storage & Handling, etc.;
  - b. Presentations on new products when they become available within the dispensary;
  - c. General updates within the cannabis industry;

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**Version:** 1.0

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**Supersedes:** Initial Release

- d. State/City regulation changes;
  - e. Company policy changes; and
  - f. Revised edits to SOPs and Forms & Logs.
4. Eskar employees will sign off on their respective Training Logs to ensure consistency and compliance after all training.
5. All SOPs and Forms & Logs will be located in a centralized repository called, "The Master Doc List."

#### Recordkeeping Procedures

Eskar employees will sign-off on each topic on one of the following Training Verification Forms:

- 1. ESK-DSP-AR-FRM-XXX Budtender Training Log
- 2. ESK-DSP-AR-FRM-XXX Inventory Specialist Training Log
- 3. ESK-DSP-AR-FRM-XXX Dispensary General Manager Training Log
- 4. ESK-DSP-AR-FRM-XXX Dispensary Assistant Manager Training Log

**Comment [1]:** Need to finalize Form Doc Number

All Employee Training Logs will include the necessary fields identified in 935 CMR 500.105(9)(d)2.d., including but not limited to:

- 1. The Time/Date in which the training occurred;
- 2. Location in which the training was received;
- 3. Training Subjects; and
- 4. Name & Title of Presenters.

#### 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

#### 8. DOCUMENT APPROVALS:



**Doc Number:** ESK-DSP-AR-SOP-102  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Consumer Check-In Procedures SOP

### 1. PURPOSE

To ensure proper consumer traffic flow procedures are being executed and maintained in a compliant manner.

### 2. SCOPE

This document will outline the proper entry and check-in procedures a consumer will follow to enter the Dispensary in compliance with the 935 CMR 500.000.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-103	ID Checking Procedures
ESK-DSP-AR-SOP-105	Leaf Logix New Consumer Profile Procedures

### 6. PROCEDURE

#### Consumer Check-In Procedures

1. The consumer will approach the Dispensary entrance and walk to one of the two check-in counters.
2. Once the consumer is inside the lobby, the Eskar employee(s) working the front desk will check the consumer's Government-Issued ID Card thoroughly, using the age verification scanner, a black light to show hidden UV images, and the ID Checking Guide (Please refer to *ESK-DSP-AR-*



**Doc Number:** ESK-DSP-AR-SOP-102

**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

*SOP-103 ID Checking Procedures and ESK-DSP-AR-SOP-105 Leaf Logix New consumer Profile Procedures).*

3. If the Government-Issued ID Card is active and valid, the Eskar employee will then search for the consumer's POS profile in Leaf Logix. To look up a potential existing consumer, Eskar employees shall:
  - a. Select the "Guest List" tab from the options on the left side of the screen in Leaf Logix and type in the consumer's last name within the search bar and hit "Enter."
  - b. The "Search Results" will appear which will generate a list of all of the consumer profiles with that name attached.
  - c. Find and select the consumer to check in by matching their date of birth from the Government-issued ID Card provided upon arrival.
  - d. The consumer's "Personal Info" page will then open.
  - e. Select the "Check-In to POS" tab on the bottom left of the screen.
4. Once the consumer is properly checked into Leaf Logix, the front desk Eskar employee will allow the consumer into the Showroom to wait in the queue.
5. Once the next Eskar employee is available to take a consumer, they will say, "Next consumer please."
6. It is the responsibility of the Eskar employee to check each consumer's Government-Issued ID Card again at their register before starting the sales transaction (Please refer to *ESK-DSP-AR-SOP-103 ID Checking Procedures*).
7. The Eskar employee will double check to ensure the information on the consumer's Government-Issued ID Card is correct and matches the profile checked into Leaf Logix.
8. Once the consumer's credentials are verified, the Eskar employee will explain the ordering process to the consumer and begin the sale.

#### 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

#### 8. DOCUMENT APPROVALS:



**Doc Number:** ESK-DSP-AR-SOP-103  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## ID Checking Procedures SOP

### 1. PURPOSE

To ensure proper steps are taken while verifying customers approved Government Issued identification cards to ensure they are twenty-one years old or older.

### 2. SCOPE

This policy applies to all Eskar employees and will provide information on acceptable forms of identification, unacceptable forms of identification, damaged/fraudulent ID's, and the proper steps and verification checks Eskar employees should take when observing customer's approved Government issued IDs at the check-in counter and POS sales floor.

### 3. DEFINITIONS

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-102	Customer Entry & Check-in Procedures
ESK-DSP-AR-SOP-118	Management & Employee Opening Procedures
ESK-DSP-AR-SOP-117	Escorting From Premises Procedures

### 6. PROCEDURE

#### Equipment

1. ID Scanner
2. Blacklight
3. I.D. Checking Guide 2021 (Each year an updated version is released. Please make sure to use the one for the current year)



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**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

### **Acceptable Forms of Identification**

A ME shall refuse to sell marijuana to any consumer who is unable to produce a Government Issued ID Card. The identification **MUST** contain a name, photograph, expiration date, and date of birth, and shall be limited to one of the following:

1. A drivers license;
2. A government-issued identification card;
3. A U.S. military identification card;
4. A Massachusetts professional license issued by the appropriate state agency; or
5. A passport/passport card.

### **Unacceptable or Fraudulent IDs**

#### Unacceptable Forms of Identification

1. Green Cards (Permanent Resident Cards);
2. Concealed Carry Permits;
3. City-issued IDs;
4. Student IDs;
5. Work Authorization Cards;
6. Global Entry Cards;
7. International IDs issued by other countries, unless the country is a US Territory;
8. US Territories include American Samoa, Guam, the Northern Mariana Islands (CNMI), Puerto Rico, and the U.S. Virgin Islands; and
9. VA Cards.

### **ID Verification Procedures**

#### Fake/Counterfeit

If an Eskar employee encounters a Government Issued ID Card that may be counterfeit, they shall immediately report the concern to the General Manager and/or Assistant Manager(s). If Eskar employees or Dispensary Management are unsure on whether or not a Government Issued ID Card is counterfeit, they can conduct the following verification checks:

#### *Feel Tests*

1. Sweep your fingers over the finish.
2. Check for bumps, ridges, and irregularities.
3. Slightly bend the ID at different angles (laminates should not wrinkle, crinkle, or break).
4. Check for peeling/splitting of corners.
5. Verify overall weight and thickness.

#### *Visual Tests*

Verify Security Features:





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**Supersedes:** Initial Release

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1. UV Images, Holograms, Microprint, and Seals.
2. Should flash in and out of light, not consistently bright.
3. If the image or hologram says “genuine,” “authentic,” “valid,” “secure,” or has a world map, it’s likely fake.

#### *Photograph Tests*

1. Many fakes have sharp lines around the face from photo shopping, also observe size/proportion of face, clarity, color, and shadows.
2. Dirt around lamination.

#### Damaged

Eskar employees shall deem a Government Issued ID Card damaged if:

1. There is any type of crack(s) found within the Government Issued ID Card and is being held together by tape;
2. A Government Issued ID Card is damaged in a way that obstructs the expiration date, date of birth, name, photo, or any other important information;
3. A Government Issued ID Card that has been re-laminated by the card-holder;
4. A Government Issued ID Card has been voided by the DMV/RMV via clipped corners or hole-punch.

#### **Verification Procedures at Consumer Check-In Vestibule**

1. Consumers will be prompted to provide their physical Government Issued ID Card to the front desk agent upon arrival.
2. The front desk agent will ensure that the Government Issued ID Card is accepted by the CCC.
3. When verifying the Government Issued ID Card, the front desk agent will check the identification for:
  - a. Date of Birth;
  - b. Verifying that the consumer is 21 years or older
  - c. Expiration Date;
  - d. Whether or not the identification is vertical;
  - e. The front desk agent will compare the photo of the identification to the consumer; and
  - f. Front desk agents should ask all consumers to remove any sunglasses or hoods obstructing their face to compliantly verify that both their photos on their Government Issued ID match the physical person.
4. Once the consumer's Government Issued ID has been verified, the front desk agent will scan the Government Issued ID with the age verification scanner, ensuring that the dates given on the scanner match the dates on the identification card.
  - a. The front desk agent will use a blacklight to check for any UV or holograms images.



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**Doc Number:** ESK-DSP-AR-SOP-103

**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

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- b. The ID Checking Guide will be used to confirm specific characteristics of each state's identification card or drivers license.
5. The front desk agent will check the consumer into Leaf Logix. New consumers will need to have a new profile created for them in Leaf Logix. (***See ESK-DSP-AR-SOP-105 Leaf Logix New Consumer Procedures***)
6. Once the consumer's Government Issued ID has been verified, the front desk agent will hand the consumer back their Government Issued ID and inform them that they will have their credentials checked again at the POS Sales Counter. The front desk agent will let the consumer onto the Sales Floor via a remote buzzer located at the front desk.
7. Consumers will be denied access into the Dispensary if:
  - a. They do not have a valid form of identification accepted by the CCC;
  - b. Their Government Issued ID is damaged beyond recognition;
  - c. Their Government Issued ID is expired; and
  - d. Their identification is voided (i.e., clipped corners, hole-punched, VOID punch).
8. If a consumer is denied access into the facility, they must be asked to leave Eskar's property.

#### **Verification Procedures at the POS – Sales Floor**

1. Consumers entering the Sales Floor will initially be directed to wait in the queue area.
2. Once an Eskar employee is available,, they will call up the next consumer.
3. Once the customer that was waiting in the queue area is at the appropriate POS station, the Eskar employee will, again, check the consumer's Government Issued ID before beginning the transaction.
4. The Eskar employee will verify the Government Issued ID, including but not limited to:
  - a. Date of Birth;
  - b. Expiration Date; and
  - c. Photo.
5. The Eskar employee will use a hand-held blacklight to check any UV or holographic images present on the Government Issued ID.
6. If the Eskar employee finds an invalid Government Issued ID they will immediately contact the General Manager or Assistant Manager(s).

#### **Temporary Drivers License Procedures**

1. If a consumer presents a temporary (paper) driver's license or state ID issued by the Massachusetts Registry of Motor Vehicles (RMV), the Eskar employee will ensure that the ID is valid and acceptable.
2. The Eskar employee will ensure that all letters and numbers on the ID are clear and legible, and that the photo is visible.
3. Temporary IDs are only valid for 30 days from the date of issuance. The Eskar employee will ensure that the ID is within the allotted time frame.

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4. The Eskar employee will further verify the ID's validity by ensuring that the ID's security features are present.
5. When held under a blacklight, the Massachusetts state seal should be visible.
6. The ID will say "Not Valid for Identification" in a red box on the right, and some of the individual's personal information, including date of birth and temporary ID expiration date, will be in a blue box on the left.
7. The Eskar employee will update the consumer's ID expiration date in LeafLogix, if necessary, and will check the ID using all typical ID-checking procedures as defined above in this SOP.

#### 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

#### 8. DOCUMENT APPROVALS



Doc Number: ESK-DSP-AR-SOP-104

Effective Date: XX/XX/XXXX

Version: 1.0

Supersedes: Initial Release

## Verified Financial Hardship Discount Program Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's verified financial hardship consumer discount procedures.

### 2. SCOPE

This document outlines the qualifying conditions consumers must meet in order to verify their eligibility for the program discount.

### 3. DEFINITIONS

**Verified Financial Hardship** - means that an individual is a recipient of MassHealth, or Supplemental Security Income, or the individual's income doesn't exceed 300% of the federal poverty level, adjusted for family size.

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-103	ID Checking Procedures
ESK-DSP-AR-SOP-105	Leaf Logix New Consumer Profile Procedures
ESK-DSP-AR-SOP-106	Leaf Logix Sales Transaction Procedures
TBD	Financial Hardship Verification Form

### 6. PROCEDURE

In accordance with 935 CMR 500.105(1)(f), Eskar must present its price list for marijuana product(s) and any other available products, and alternate price lists for consumers with documented Verified Financial Hardship, as defined in 935 CMR 501.002: Verified Financial Hardship, as required by 935 CMR 501.100(1)(f). A consumer is considered to have verified financial hardship if they are the recipient of

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**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

MassHealth, Supplemental Security Income (not to be confused with disability insurance), or Supplemental Nutrition Assistance Program (SNAP), or earn a household income that does not exceed 300% of the federal poverty level, adjusted for family size. Proof of verified financial hardship includes a copy of one of the following:

1. Supporting documentation of a MassHealth Acceptance Letter for the current year, or official MassHealth redetermination letter for the current year with a MassHealth Card;
2. Supplemental Security Income (SSI) benefit verification letter for the current year;
3. Supplemental Nutrition Assistance Program (SNAP) statement from the current year or by logging into the EBT application on their phone.

Complete State or Federal tax return from this year or last year, including all attachments . Below is a chart of the federal poverty level for each family size and the amount of money they would need to make below to qualify:

300% of Federal Poverty Level	
Family Size	Annual Income
1	\$38,280
2	\$51,720
3	\$65,160
4	\$78,600
5	\$92,040
6	\$105,480
7	\$118,920
8	\$132,360
Each Additional Member	\$4,480

#### **Eskar Consumer Verified Financial Hardship Procedures**

1. Consumers will show an Eskar employee proof of verified financial hardship using one of the qualifying pieces of documentation mentioned above. The Eskar employee will then verify the information to determine if the consumer's documentation qualifies for the Verified Financial Hardship Discount Program.

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2. If the document meets the requirements, the consumer will then fill out a Financial Hardship Verification Form located in Check-in.
3. The Financial Hardship Verification Form will then be scanned into the computer.
  - a. Do not scan the documents the consumer brought in as proof of hardship. Only the Financial Hardship Verification Form will be kept on file and updated two years after the previous verification with supporting documentation.
4. A note will be saved in the consumer's profile detailing that Financial Hardship has been verified and when the verification will expire the following year.
5. To write a note in a consumer's profile, Eskar employees shall:
  - a. Search for the consumer by name in the search bar at the top of the Leaf Logix application when on the "Guest List" page and press enter;
  - b. Select the profile and verify that they are the right consumer by their Government-Issued Driver's License or other acceptable forms of identification;
  - c. Select the "Info" tab along the left side of the consumer's profile;
  - d. Scroll down to "Notes" and click on the open space below;
  - e. Enter the date and "Financial Hardship verified" which will be followed by the employee's initials; and
  - f. When verifying a returning Verified consumer's profile, Eskar employees shall ensure the date of expirations for their hardship has not gone past the two year mark for qualifying;
  - g. Press the "Save Changes" button; and
  - h. Go back to the "Personal Info" tab located on the left side of the screen and scroll down to discounts. Select the first open slot and a menu will appear. Choose "Financial Hardship (10%)" and click "Save Changes."
6. The scanned document will also need to be saved in Eskar's document repository.
7. The hard copy of the agreement will be filed in  .

**Comment [1]:** TBD

## 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

## 8. DOCUMENT APPROVALS:

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**Doc Number:** ESK-DSP-AR-SOP-105  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Leaf Logix New consumer Profile Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's new consumer procedures for Leaf Logix.

### 2. SCOPE

This procedure applies to all Eskar employees and explains the procedures when a new consumer visits the Dispensary for the first time.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-103	ID Checking Procedures
ESK-DSP-AR-SOP-102	Customer Entry & Check-in Procedures

### 6. PROCEDURE

1. Eskar employees working in the check-in area will follow the Dispensary entrance and ID checking procedures (*Please refer to ESK-DSP-NB-SOP-102 Customer Entry & Check-in Procedures and ESK-DSP-NB-SOP-103 ID Checking Procedures*).
2. Create a new consumer profile for the new consumer within Leaf Logix.
3. If the consumer already has a profile, select their profile and click "Check In to POS."
4. To create a new consumer profile, click on the "New Profile" option located along the left side of the screen in Leaf Logix guest list screen. Import the consumer's full name and click on the "Save"



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**Doc Number:** ESK-DSP-AR-SOP-105**Effective Date:** XX/XX/XXXX**Version:** 1.0**Supersedes:** Initial Release

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button and a new profile will be generated. Additional information to be added to the consumer profile include:

- a. Phone number
  - b. E-mail Address
  - c. Date of Birth
  - d. Driver's License number and expiration date
5. Verify that all sections of the profile are correct prior to allowing them onto the dispensary sales floor.
  6. Let the consumer know to keep their Government-Issued ID out to give to the Eskar employee on the sales floor for a second verification.

#### 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

#### 8. DOCUMENT APPROVALS:





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**Doc Number:** ESK-DSP-AR-SOP-105  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

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**Doc Number:** ESK-DSP-AR-SOP-106  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Leaf Logix Sales Transaction Procedures SOP

### 1. PURPOSE

To ensure consistent and compliant use of Eskar's chosen point of sales and inventory control system, Leaf Logix.

### 2. SCOPE

This procedure applies to all Eskar employees and explains the steps of processing a transaction in the point of sale system, Leaf Logix.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-102	Customer Entry & Check-in Procedures
ESK-DSP-AR-SOP-103	ID Checking Procedures
ESK-DSP-AR-SOP-109	Product Handling Procedures

### 6. PROCEDURE

1. Eskar employees will turn on the computer at the register station and open the Leaf Logix POS through the bookmarked webpage located at the top of the screen under the web address bar.
2. The Eskar employee will login with their assigned Username and Password and select "Go."
3. On the location page, the Eskar employee will find **Eskar** and press "Select."
4. On the "Select Register" page, the Eskar employee will pick the register at the station they will be working at. This will bring them to the guest list page.

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**Version:** 1.0

**Supersedes:** Initial Release

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5. Before consumers enter the Dispensary Sales Floor, they must first enter the building through the check-in area, where their licenses will be verified by an Eskar employee. **(See ESK-DSP-AR-SOP-102 Customer Entry & Check-in Procedures)**
6. The Eskar employees will click on the consumer's name in the Leaf Logix guest list and will then be prompted to select from the pull down menu listed below the name. They should choose the "Select" option.
7. By choosing this option, the Eskar employees will be shown the POS view for that selected consumer and their profile
8. The consumer's profile information will be displayed on the left-hand side of the page. The Eskar employee will check the consumers ID again to make sure this information matches the ID and the Leaf Logix profile.
9. In the bottom right-hand corner, the consumer's "Allotment" will be shown with a gram amount next to it. This is the amount of marijuana that the consumer can purchase within a 24-hour period.
10. After the consumer has informed the Eskar employee of products they would like to purchase, the Eskar employee will add items to the sales queue by scanning each item's pre-attached barcode. **(Always scan in items. Barcodes are attached to every item to ensure inventory and compliance consistency. DO NOT SEARCH FOR ITEM) (See ESK-DSP-AR-SOP-109 Product Handling Procedures)**
  - a. Multiple items of the same batch of product will not produce additional line items when scanned. Instead, the quantity of the item displayed on the right side of the product will increase by 1 for each time an item of the same batch is scanned. Attach each individual label as it is printed, even if there are multiples of the same product.
  - b. Once a marijuana product is scanned, Leaf Logix will automatically print out a label that has the item name, the consumer's name, date of purchase, Eskar's address, phone number, license number, and website information in compliance with 935 CMR 500.105 (5)(a)1.
    - i. The name and registration number of the ME that produced the Marijuana, together with the retail Licensee's business telephone number, electronic mail address, and website information, if any;
  - c. Eskar employees should immediately attach the label to the product in a place that does not obstruct any of the label information about the product, such as warning labels and product information.
  - d. Non-medicated products, such as accessories, will not produce a consumer label to be affixed; however, all other procedures should still be followed.
11. After the Eskar employee scans and labels an item, the Eskar employee will place the product in a product bin, which should be accessible at every register station **(See ESK-DSP-AR-SOP-109 Product Handling Procedures).**
12. Once all products have been scanned and labeled, the Eskar employee will read back the scanned items to the consumer so that they may confirm the items being purchased.

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**Supersedes:** Initial Release

13. If a consumer does not want a product that has already been scanned, the Eskar employee will remove each undesired product from the cart individually, remove the label for disposal, and go back to Step 10 of this procedure for any new items added to the cart.
14. After applying all discounts and coupons, the Eskar employee will let the consumer know the value of their total purchase, located in the “Charge” box at the bottom right of the screen, and ask which payment method the consumer would like to pay with (Cash or Debit).
15. The Eskar Employee will click on the “Charge” button, and a pop-up screen will appear to choose the method of payment, as shown in the example below:

- a. Cash paid: the Eskar employee will enter the amount of money the consumer has given (if exact cash, they may choose that option at the bottom left of the pop-up)
  - b. Debit paid: the Eskar employee will enter the amount charged to their debit card
  - c. Split payment (cash and debit): the Eskar employee will enter in the amount of cash that they have been given. The remainder to be charged will appear in red in the “Change” row with a negative sign in front of it. The Eskar employee should round this number up to the nearest \$5 increment and charge the consumer’s debit card in that amount)
16. The Eskar employee will enter their PIN and choose “Checkout” on the bottom right of the pop-up.
  17. An additional pop-up will appear indicating the amount of change that is owed to the consumer. A receipt will print automatically. The Eskar employee should select “Print Receipt” in this pop-up in order to print another receipt for store records.
  18. Utilizing the itemized POS receipt to verify all products, the Eskar employee should place each product inside the bag, one at a time, and check that item off on the receipt. When finished, they will place the receipt inside of the bag and give the bag to the consumer (***See ESK-DSP-AR-SOP-109 Product Handling Procedures***).

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- a. If the consumer does not want the bag, make sure that the receipt stays with the item(s).

## Transaction Recordkeeping

1. All data from previous transactions are recorded through the individual consumer's Leaf Logix profile. You can review these transactions by taking the following steps in the Leaf Logix POS view—
  - a. Click on "Guest List" → Search for the consumer using the search bar at the top of the screen (search by the consumer name) → If using the consumer name many profiles will appear. Pick the correct consumer by verifying it against the consumer's date of birth → Click on the consumer profile to view their information and transaction history → Click on "History" located along the left side of the screen to view their previous transactions → There are two tabs that populate within the history menu option, "Product History" and "Transaction History" → The product history will show you line by line, all of the individual products purchased by the consumer all broken down by day and time → The transaction history will show you the full transaction broken down by day and time.
  - b. The product history tab displays the date purchased, a receipt number, an individual product description, the products SKU, lot/batch number, sale status (complete,) product weight, location, and which Eskar employee conducted the transaction.
  - c. The transaction history tab displays the date the transaction was completed, a receipt number, the total number of products/items sold, the total cost of the transaction, the discount total (if applicable,) the tax added (if applicable,) the total including discounts and tax, the payment type, the transaction status (sold,) the register the transaction was conducted from and the location.
2. If any daily transactions need to be reviewed, all transaction information is maintained and recorded through Leaf Logix and is also available for review by the Commission upon request.

## 19. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

## 20. DOCUMENT APPROVALS:



**Doc Number:** ESK-DSP-AR-SOP-107  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Virtual Debit ATM and Change Handling Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's Cashless ATM and cash/change handling policy.

### 2. SCOPE

This policy applies to all Eskar employees. This policy will cover the steps for utilizing the Cashless ATM system for payment and the proper procedures for accepting cash as during consumer transactions.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-106	Leaf Logix Sales Transaction Procedures
ESK-DSP-AR-SOP-111	Online/Phone Ordering and Fulfillment Procedures

### 6. PROCEDURE

#### Cash Handling Procedures:

1. Eskar accepts cash and debit cards.
2. Each cash denomination larger than \$20 must be verified with a counterfeit pen.
  - a. If the bill turns brown where the counterfeit pen marked it, it is a counterfeit. The General Manager and/or Assistant Manager(s) will need to be alerted.
3. The state of Massachusetts applies a 6.25% sales tax for retail Marijuana purchases as well as accessories and merchandise.



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**Version:** 1.0

**Supersedes:** Initial Release

4. All Eskar employees will be required to count back change to consumers to ensure monetary consistency for their individual cash drawers along with the complete daily deposit.
5. Eskar employees are expected to have accurate cash totals at the end of each shift. If an Eskar employee incorrectly gives change or takes in the incorrect tender from a consumer, they may face disciplinary action up to termination.

**Cashless ATM Procedure:**

1. Eskar employees may process all debit payments via the cashless ATM card reader, located at each POS station. Eskar employees will inform the consumer of the following points:
2. All debit transactions will be required to round up to the next \$5.00 increment amount to be processed by the cashless ATM system.
3. E.g. If the total of the transaction is \$57.00 and the consumer wants to use the cashless ATM, then the Eskar employee will round up to \$60.00, charge the card for that amount, and give \$3.00 in cash back to the consumer.
4. The cashless ATM charges a fee of \$3.50 for use, on top of the transaction total, for any transaction.

**7. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

**8. DOCUMENT APPROVALS:**



**Doc Number:** ESK-DSP-AR-SOP-108  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Sales Transaction Void Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's transaction voiding procedures.

### 2. SCOPE

This procedure applies to the General Manager and Assistant Manager(s) and will explain the procedure for voiding a transaction.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-110	Product Returns Procedures

### 6. PROCEDURE

Only the General Manager and Assistant Manager(s) have the permission and ability to void transactions. When voiding a sales transaction, Dispensary Management shall follow the steps below:

1. Navigate to the consumer profile in Leaf Logix.
2. Open up the "Personal Info Tab" to display the consumer's information. Select "History" to view the consumer's transaction history.
3. There are two options when viewing consumer transaction history, select "Transaction History" to view the sale receipts in a list rather than each individual product purchased in a list.
4. Select the transaction that is in question.
5. This will then pull up a detailed screen for the transaction, "Transaction Details."



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**Supersedes:** Initial Release

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6. Management will provide their initials and a note as to why the transaction was voided (for accounting and compliance purposes).
7. Management will type in the designated password and select, "Void Transaction."
8. Management will be able to go back into the consumer transaction history and confirm the sale was successfully voided.

## 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

## 8. DOCUMENT APPROVALS:



**Doc Number:** ESK-DSP-AR-SOP-109  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Product Handling Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's company marijuana product handling procedures.

### 2. SCOPE

This procedure applies to all Eskar employees and outlines the proper way to handle marijuana products sold at Eskar's Dispensary.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-107	Virtual Debit ATM and Change Handling Procedures
ESK-DSP-AR-SOP-108	Sales Transaction Void Procedures

### 6. PROCEDURE

1. Eskar employees will follow the necessary steps to prepare the Dispensary Showroom at the start of the business day, with the assistance of the General Manager and/or Assistant Manager(s).
2. All inventory will be removed from the vault and moved onto the sales floor each morning before business hours.
3. Consumers may request to see the physical packaged product they are interested in purchasing. When an Eskar employee is handling marijuana products, they must be wearing gloves.
4. DO NOT TAKE PRODUCTS OUT OF THE CONTAINERS TO HANDLE.

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- a. Eskar employees will take one product out at a time, putting products away after a consumer is done observing. Eskar employees shall ALWAYS be holding the product, never turning their back to the consumer and never leaving anything on the glass counter or alone with a consumer.
  - b. Reminder, there is no consumption of marijuana products on Eskar's property.
5. When selling edibles to consumers, an Eskar employee will need to inform the consumer of the edible doses. These are sometimes broken down into multiple servings and are located on the product label.
6. Eskar employees will also need to inform the consumer of any storage needs once they take their purchased cannabis product home (Example- keep in a cool/dry place, must be refrigerated, shake before drinking, etc.).
7. Eskar employees will ensure the consumer is fully aware of the product type as well as the strain information.
8. Eskar employees conducting consumer transactions will have designated tills/registers. Within the back counter space behind each register, an Eskar employee must remain organized and within their reasonable "zone" so as to not interfere with other Eskar employees conducting transactions. This is to ensure all Eskar employees have the necessary space to remain organized and compliant when completing transactions.
9. All products being sold must be scanned. Do not search for a product to add to the transaction. If there are any issues with barcodes scanning into the POS system, please inform the General or Assistant Manager(s).
10. When scanning products in Leaf Logix, dispensary Eskar employees will hold only one product at a time to ensure the correct SKU is being scanned.
11. Eskar employees will double check that the printed label information matches the product being sold to the consumer.
12. Eskar employees can collect the products that the consumer wishes to purchase in the white shopping bins located at each register station. There should not be products inside the shopping bin that have not already been scanned and labeled. The number of physical products must match the digital entry into the transaction screen.
  - a. Once the Eskar employees have completed the scanning and labeling process of the transaction, the employee will review and read back the sale with the consumer to ensure all products in the shopping bin have been added into the POS system appropriately.
13. Once the transaction is complete the Eskar employee will pack all necessary marijuana product(s) and non-medicated cannabis products into a bag(s). During the packing process, Eskar employees will utilize the itemized POS receipt to verify that all products have been scanned in compliance with state regulations.



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**Doc Number:** ESK-DSP-AR-SOP-109  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

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**14. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

**15. DOCUMENT APPROVALS:**



**Doc Number:** ESK-DSP-AR-SOP-XXX  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Product Returns SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's return and waste procedures.

### 2. SCOPE

This procedure applies to all Eskar employees.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-108	Sales Transaction Void Procedures

### 6. PROCEDURE

1. All Marijuana returns and waste, including waste composed of or containing finished Marijuana, shall be stored, secured, and managed in accordance with applicable state laws and regulations and local ordinances and regulations. All returns and waste disposed of must be recorded in the ESK-WDP-AR-FRM 001 Green Waste Signature Log and ESK-WDP-AR-FRM 002 Green Waste Log:
  - a. The consumer returning the product;
  - b. The date and time of return and/or disposal;
  - c. The quantity and type of product returned and/or disposed of;
  - d. The reason for the return and/or disposal;
  - e. The manner of disposal; and
  - f. Physical printed names, signatures and titles of the Eskar employees present.



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**Version:** 1.0

**Supersedes:** Initial Release

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2. Eskar will keep a written record of any disposal of waste for at least three years.
3. Eskar will accept, at no charge, unused, excess, or contaminated marijuana from a consumer and shall destroy it (Please refer to *ESK-WDP-AR-SOP-200 Marijuana Waste Disposal Procedure*).
4. When a consumer returns a marijuana product to the dispensary in which it was purchased from, they will first need to ensure the return is within seven days of the original purchase. On the consumer's receipt there is a notice that states, "All returns and exchanges must be completed within seven days of purchase. After one week, any unused marijuana products may be returned for safe disposal but will not be eligible for an exchange."
5. If a consumer wishes to return a product, for waste purposes only, they will be able to bring back any unused product at any time to be safely disposed of. The General Manager or Assistant Manager(s) will take the same steps to return the marijuana products within the POS system, Leaf Logix and also in the state system, Metrc.
6. The General Manager and Assistant Manager(s) will look up the consumer within Leaf Logix.
7. Once the consumer has been checked into the POS system, The General Manager and Assistant Manager(s) will go to the "History" tab along the left hand side of the POS screen. From here they will take the following steps to complete the POS return:
  - a. Click "History"
  - b. Click "Transaction History"
  - c. Select the transaction to be returned (they are organized by recent date)
  - d. This will then bring up a screen that breaks down the transaction by individual products purchased
  - e. Select the product that the consumer is going to be returning
  - f. On this same screen you will see a green drop down bar labeled "Transaction Actions," near the bottom of the pop-up screen, select "Return"
  - g. From here you will have another pop-up screen appear asking you to designate the process of the return
  - h. The General Manager and Assistant Manager(s) will always select "No" for the "Cash Returned" section because Eskar does not process cash returns, only be product exchanges
  - i. The General Manager and Assistant Manager(s) will then select "Yes" for the "Returned to Inventory" section because the physical product will need to be added back into Eskar's location's Dispensary license POS inventory system as well as the facilities Metrc license
  - j. Due to the API being used through Leaf Logix and Metrc, the inventory will also be returned into Metrc noting it is a returned sale
  - k. Once these two fields are designated, The General Manager and Assistant Manager(s) will include a detailed note for the return explaining the reasoning and then select "OK."
8. Once the inventory is added back into the Leaf Logix POS system and Metrc by taking the above steps, The General Manager and Assistant Manager(s) will physically take the returned product from the consumer and take it into the Vault.



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**Supersedes:** Initial Release

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9. Inside the vault, there is a “Waste Bin” this bin holds all of the physical waste inventory that is waiting to be added to that day's physical waste processing. The General Manager and Assistant Manager(s) will add the newly returned products to this bin and place it back onto the vault shelf.
10. The physical waste products are to be processed daily, with the exception of the weekends. All weekend returns and waste will be processed with the waste on Mondays. However, all record information will notate the day of the actual return and the day of the actual waste process.
11. To complete the returned transaction, The General Manager and Assistant Manager(s) will replace the returned product with a comparable replacement product. The monetary total must be of equal or lesser value.
12. Eskar employees will begin a new transaction for the consumer and scan in the product that is going to be in exchange for their return.
13. Once the product is scanned into the POS, The General Manager and Assistant Manager(s) will discount the product to the monetary value for the return.
14. Once all steps are completed on the sales floor by The General Manager and Assistant Manager(s), Eskar employees will take control over the product within the physical waste bin.
  - a. ALL marijuana items that have been returned by a consumer must enter the waste stream via Leaf Logix.
  - b. ALL marijuana items unfit for sale must enter the waste stream via Leaf Logix.
  - c. ALL marijuana items that have been returned by a consumer must enter the waste stream via Metrc.
  - d. ALL marijuana items unfit for sale must enter the waste stream via Metrc.
15. Upon receiving a return, The General Manager and Assistant Manager(s) will verify that the returned item has been digitally populated in the “Quarantine” room in Leaf Logix.
16. The General Manager or Assistant Manager(s) will digitally move inventory to the “Quarantine” room in Leaf Logix.
17. The General Manager or Assistant Manager(s) will record the following information:
  - a. Date/Time;
  - b. Product Description;
  - c. Product ID (Metrc Tag);
  - d. Quantity; and
  - e. Reason for Return.
18. The General Manager or Assistant Manager(s) will then place the product in the lockable quarantine cabinet.
19. The General Manager or Assistant Manager(s) will dispose of all returned marijuana products (Please refer to *ESK-WDP-AR-SOP-200 Marijuana Waste Disposal Procedures*).
20. Once all physical waste steps have been completed and all record keeping has been verified/uploaded, the General Manager or Assistant Manager(s) will begin to remove the marijuana products from both Leaf Logix and Metrc.

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**Supersedes:** Initial Release

21. Leaf Logix is directly integrated with the stated mandated system, Metrc. To complete an adjustment in both, you simply have to make the initial correction in Leaf Logix (see image below). Once this is entered and saved, the same adjustment will be implemented in the Metrc inventory for the dispensary license.

The screenshot displays the Airizer Q inventory management interface. On the left is a dark sidebar with navigation options: LEAF LOGIX, REPORTS, POS, CULTIVATION, MAINTENANCE, INVENTORY (with sub-options like View Inventory, Integration Reconciliation, Journal, Manifest, Receive, etc.), SETTINGS, HELP, INTEGRATIONS, and LOGOUT. The main area shows a form for adjusting inventory. The form includes fields for SKU (29678252), Category (Accessories), Batch Name, Package ID (00021), Source Package ID, Gross Weight, Net Weight, Flower Equivalent, Quantity Available (1), Product Grams, Price (150), Cost (115), Status, Room (Active Dispensary), Vendor (Greenlane Wholesale), Source Batch, Packaging Date, Inventory Date (06/30/2018), and Expiration Date (07/01/2019). A green 'Update' button is at the bottom. On the right, a dropdown menu for 'Reason' is open, showing a list of reasons: API Related Error, Drying, Entry Error, Over/Under Pulled, Package Material, Plants Unpacked, Processing Loss, Scale Variance, Spoilage, Theft, and Waste. The 'Waste' option is highlighted in blue. Above the dropdown, there are tabs for 'Incremental' and 'Absolute', and a field for 'Amount' (1). A note below the dropdown says '\*Use negative amount to r' and there is an 'Adjust' button.

## 22. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

## 23. DOCUMENT APPROVALS:

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**Doc Number:** ESK-DSP-AR-SOP-111

**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

## Pre-Order & Fulfillment Procedures SOP

### 1. PURPOSE

The purpose of this SOP is to establish and maintain effective processes for Eskar's online pickup service.

### 2. SCOPE

The Online Pickup Ordering and Fulfillment Procedures SOP describes Eskar's process for its employees to initiate and complete a telephone or online sales transaction with a consumer.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-105	Leaf Logix New Consumer Profile Procedures
ESK-DSP-AR-SOP-106	Leaf Logix Sales Transaction Procedures
ESK-DSP-AR-SOP-109	Product Handling Procedures

### 6. PROCEDURE

#### Online Fulfillment and Pickup Procedures

1. Eskar employees will power on the designated "Online Orders" computer, located at TBD, and open Google Chrome, located in the toolbar at the bottom of the screen. All websites used for ordering will automatically open, including LeafLogix (POS) and MassCIP (state tracking software). The Eskar employee will log into these websites with their credentials.

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# ESKAR

**Doc Number:** ESK-DSP-AR-SOP-111  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

2. Eskar employees will ensure the Dutchie Terminal, which is an iPad located in  , is plugged in and powered on.
3. The Dutchie Terminal will audibly chime to let Eskar employees know when an order has been placed. A message will appear on the screen, either displaying the consumer's name, or, if there are multiple orders, showing the number of orders. The Eskar employee will press the blue button at the bottom of the pop-up message that says "Confirm and Print."
4. Once the Eskar employee has pressed "Confirm and Print," the printer attached to the Terminal will print out the "pick list" receipt(s) for the order(s), showing the item(s) the consumer(s) intends to purchase. The Eskar employee will place each receipt into a designated product bin.
  - a. Orders should auto-populate into the POS queue, meaning that Eskar employees will not need to check them into the system.
5. Profiles for new consumers should be automatically created, based upon the information that the consumer provides to Dutchie. If so, Eskar employees should verify all given information, complete the consumer's profile as thoroughly as possible.
6. Eskar employees will fulfill the consumer's order.
7. While scanning the order, a "pick list" will appear on-screen in LeafLogix, with the number of unscanned items remaining displayed. Eskar employees may utilize this feature to ensure that the entire Dutchie order has been scanned in, which may be confirmed by the pick list number reaching 0.
8. If there are any items that are out of stock or unavailable in a consumer's order, Eskar employees may communicate with the consumer by using the phone number listed on the consumer's LeafLogix and/or Dutchie profile.
9. Eskar employees will then check to ensure that the items that are physically present are each scanned into LeafLogix properly.
10. In order to do so, the Eskar employee will print a receipt from LeafLogix by clicking the "Print Receipt" button. It may be found at the top of the LeafLogix order; it is the second button immediately to the right of the "Qty" header that will be shown above the first product listed on the screen.
11. The receipt will show all items scanned into the cart, and the Eskar employee will ensure that all items that are physically present are reflected on the receipt. Once an item has been confirmed on the LeafLogix receipt, the Eskar employee will check each item off of the receipt one by one with a pen or marker and, only then, may place that item into the consumer's bag. Items must be checked one at a time. Items which require constant refrigeration (e.g. certain edibles or beverages) will NOT be placed into the bag. Once the entire order has been accounted for, the Eskar employee will place the LeafLogix and Dutchie receipts in the bag.
12. Prior to releasing the consumer back to the queue, the Eskar employee will click on the "Notify" button at the bottom right of the POS screen, adjacent to the "Charge" (Total) button.

**Comment [1]:** TBD



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13. The Eskar employee will then be prompted in a pop-up to “Notify Customer?” and will confirm this action by selecting “Notify.” This action will remove the consumer from the queue on the Dutchie Terminal.
14. The Eskar employee will no longer be able to view the consumer's Dutchie order or print another picklist receipt from the Terminal. However, the General Manager and/or Assistant Manager(s) with administrative access will still be able to view the order details within the back end of Dutchie if necessary.
15. Eskar employees will release the consumer to the Guest List, as per normal transaction procedures, by selecting the “Release to Guest List” button on the left side of the POS screen.
16. Eskar employees will then write the consumer’s initials on a label and place it onto the consumer’s bag.
17. If the consumer’s order includes an item that requires continuous refrigeration (e.g. certain edibles or beverages), the Eskar employee will place a label on the consumer’s bag, adjacent to their name, that says “FREEZER,” which will indicate that an item is being refrigerated. The Eskar employee will NOT place the specific item into the bag, and will instead place a sticky note on the item with the consumer’s name, and place that item in the refrigerator located in the [redacted] of the dispensary.
18. Based on the consumer's last name, the Eskar employee will place the bag, with the labeled side facing outwards, in the appropriate cabinet within the pickup area of the dispensary.
19. Eskar employees will complete the transaction in Leaf Logix when the consumer arrives in person and provides payment.
20. The Eskar employee will transfer the product to the consumer through the fulfillment pickup window.

**Comment [2]:** TBD.

#### **Dispensary MTC Eskar employee Phone Ordering Procedures**

When a consumer calls Eskar, Eskar employee taking the order will:

1. Confirm the consumer’s information, including but not limited to:
  - a. Consumer First and Last Name; and
  - b. Date of Birth.
2. After obtaining all the required information from the consumer, Eskar employees may assist in providing information on:
  - a. The available types of marijuana and marijuana finished products at Eskar; and
  - b. Methods by which marijuana can be used.
3. Eskar employees may scan items into the consumer's cart in Leaf Logix. Please note at this stage the Eskar employee may **NOT** complete the transaction until the consumer physically arrives at the facility.
4. Scanning products into a cart will enable Eskar employees to keep an accurate inventory of products that are available for future orders.

**Comment [3]:** Not sure if you're going to allow employees to take orders via phone.



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5. In order to fill the order, Eskar employees will collect all items for the order and place them in a designated product bin. Once all marijuana products and accessories have been collected, the Eskar employee will confirm all products in the bucket with the consumer.
6. The Eskar employee will ask the consumer if they would like to receive a call back with their total or if they would like to wait on hold while items are being added to the POS order in order to know their total.
7. The Eskar employee will inform the consumer that Eskar will only hold onto their order until the end of the day. Otherwise, products will be returned to stock.
8. The Eskar employee will then check to ensure that the items that are physically present are each scanned into LeafLogix properly.
9. In order to do so, the Eskar employee will print a receipt from LeafLogix by clicking the "Print Receipt" button. It may be found at the top of the LeafLogix order; it is the second button immediately to the right of the "Qty" header that will be shown above the first product listed on the screen.
10. The receipt will show all items scanned into the cart, and the Eskar employee will ensure that all items that are physically present are reflected on the receipt. Once an item has been confirmed on the LeafLogix receipt, the Eskar employee will check the item off of the receipt with a pen or marker and, only then, may place that item into the consumer's bag. Once the entire order has been accounted for, the Eskar employee will place the LeafLogix receipt in the bag.
11. When the order is confirmed to be completely fulfilled, the MTC Eskar employee will release the consumer to the Guest List, as per normal transaction procedures, by selecting the "Release to Guest List" button on the left side of the POS screen.
12. Eskar employees will then write the consumer's initials on a label and place it onto the consumer's bag.
13. Based on the consumer's last name, the Eskar employee will place the bag, with the labeled side facing outwards, in the appropriate cabinet in the pickup area of the dispensary.
14. Eskar employees will complete the transaction in Leaf Logix when the consumer arrives in person and provides payment.
15. The Eskar employee will transfer the product to the consumer through the fulfillment pickup window.

#### 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

#### 8. DOCUMENT APPROVALS:

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**Doc Number:** ESK-DSP-AR-SOP-111  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

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**Doc Number:** ESK-DSP-AR-SOP-114  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Retail Cash Bags Procedures SOP

### 1. PURPOSE

To ensure proper and consistent cash handling procedures of the retail cash bag assigned to each Eskar employee.

### 2. SCOPE

The cash handling procedures mentioned within this document outline the responsibilities that go into handling retail lockable cash bags.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-107	Virtual Debit ATM and Change Handling Procedures
ESK-DSP-AR-SOP-118	Management & Employee Opening Procedures

### 6. PROCEDURE

1. Every Eskar employee will receive a lockable cash bag containing a bank of \$200.00 at the beginning of their work shift.
2. It is the Eskar employee's responsibility to accurately exchange cash with consumers throughout their respective shift. Once the shift has ended, the total sales will be identified and cash to be returned to Management must equal out so that \$200.00 is left over within the Eskar employee's lockable cash bag.



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**Doc Number:** ESK-DSP-AR-SOP-114**Effective Date:** XX/XX/XXXX**Version:** 1.0**Supersedes:** Initial Release

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3. Cash must not be left unattended on the Dispensary floor unless two other Eskar employees are present.
4. Cash is either stored in a lockable cash drawer during the Eskar employee's shift or secured in the Eskar employee's assigned lockable cash bag which will be stored in the Vault.
5. Access to the Vault is restricted to the General Manager and Assistant Manager(s).
6. At no point is an Eskar employee permitted to remove funds from their lockable cash bag outside of store hours.
7. Bi-weekly audits of each Eskar employee's cash bag will be conducted by the General Manager and Assistant Manager(s) to verify the \$200 bank.
8. The General Manager and Assistant Manager(s) must always be present during a cash exchange of any kind between Eskar employees.

**9. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

**10. DOCUMENT APPROVALS:**



**Doc Number:** ESK-DSP-AR-SOP-115

**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

## Cash Drop & EOD Closing Procedures SOP

### 1. PURPOSE

This policy applies to all Eskar employees to ensure consistent and safe daily cash drop processes and consistent closing processes daily within Eskar's Dispensary.

### 2. SCOPE

This procedure will discuss the processes of midday cash drops and provides instructions on how to properly record cash deposit procedures. This procedure will also go over the closing process of the Leaf Logix system at the end of each day.

### 3. DEFINITIONS

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-107	Virtual Debit ATM and Change Handling Procedures
ESK-DSP-AR-SOP-119	Management & Employee Closing Procedures

### 6. PROCEDURE

#### Mid-Shift Cash Drop

1. A cash drop should be done at least once during the day if business permits. The General Manager or Assistant Manager(s) will initiate the drop unless an Eskar employee requests it due to the volume of bills within their till exceeding the max amount. Once an Eskar employee notices that their cash drawer is beginning to near \$1,500.00, they will get the attention of their General Manager or Assistant Manager(s) and let them know that a drop is needed.

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2. All bill counting for Mid-Shift Drops will need to be on camera for the security of the Eskar employees.
3. During all drops, the Eskar employees will take their cash drawer into the Vault or Office to be counted and verified with a General Manager or Assistant Manager(s).
4. When filling out the Cash Drop/Dispensary Closing Report, the Eskar employee will need to fill in all information at the top of the page, including but not limited to:
  - a. Name;
  - b. Date;
  - c. Location; and
  - d. Register Number.
5. Eskar employees will record the total monetary value of cash and coins being dropped, along with the time and initials for verification (located in the table at the top of the page).
6. Both the Eskar employee and the General Manager or Assistant Manager(s) will count and verify the amount of bills being placed into a cash drop.
7. Once the General Manager or Assistant Manager(s) has confirmed the drop matches the total , they will add their initials under the section of the table labeled “Approved by” and take the employees Cash Drop/Closing Report to be filed inside of the Vault until the end of their shift.
8. Once the drop is counted, verified, and recorded, all cash will be placed in an envelope with the Eskar employee’s name on it and placed into the safe to be held there until the close of business or the end of the Eskar employee’s shift. The drops will be collected in the evening’s deposit bag and combined with the final deposit at the close of business. These drops will remain separated per Eskar employee until that evening’s deposit has been confirmed and recorded by the General Manager or Assistant Manager(s).
9. At the end of the Eskar employee shift, they will retrieve their in-progress Cash Drop/Closing Report from the vault to add in the remainder of their deposit.
10. The total amount from the drop categories in the above table will be carried down into the “End of Shift Cash Deposit” table, under the section labeled, “Drop Total.”
11. These totals will be added to the Eskar employee shift closing deposit and physically added together in the closing deposit bag once the General Manager or Assistant Manager(s) has verified the added deposit and final deposit total for that individual Eskar employee.
12. The totals recorded on the “Mid-Shift Cash Drop” table will be carried over into the Eskar employee’s Cash Drop/Dispensary Agent Closing Report so that the final deposit total can be recorded and verified.

## Leaf Logix Closing Procedure

1. Eskar employees have control over POS settings, inventory, Eskar employee maintenance, etc. through: [Insert Leaf Logix Backend Link Here](#)

Comment [1]: TBD



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2. If an Eskar employee is going to be counting down their register mid-shift or if they are working a half-day shift, they will need to exit the sales floor with their removable drawer to count down their cash deposit.
  - a. Eskar employee's shall not count down cash deposits in front of consumers.
3. All cash counting needs to be on camera for the security of the Eskar employee's.
4. If a Mid-Shift Cash Drop didn't occur, Eskar employee's will begin their closing processes by filling out a closing sheet.
5. When filling out the Cash Drop/Dispensary Closing Report, the Eskar employee will need to fill in all information at the top of the page, including but not limited to:
  - a. Name;
  - b. Date;
  - c. Location; and
  - d. Register Number.
6. The section to be completed at the close of a shift is "End of Shift Cash Deposit."
7. Utilizing the table breakdown, the Eskar employee will count and record all monetary denominations being placed into the daily deposit. There are separate sections for the physical count as well as the monetary total of grouped bills and coins.
8. Once all monetary totals are recorded, the Eskar employee will initial next to the individual totals noting that they have verified the totals with zero discrepancies.
9. Directly below the deposit table there is a line indicating "Total Cash Deposit, Bills + Coins + Drop." This is where the Eskar employee will record the added total of all bills, coins and any cash previously dropped that day.
10. Directly below the total cash deposit line there is space to note any "Debit Card Totals" recorded that day. The Eskar employee will add up all of the Cashless ATM receipts from that day (not including the Cashless ATM fee of \$3.50) and record that total on the debit card totals field.
11. Directly below the debit card (Cashless ATM) totals line is a space to note the "PSA Total Counted Deposit" which is the grand total of all currency being placed into their daily deposit. The Eskar employee will add up all above fields to find their ending closing total.
  - a. "Total Cash Deposit" + "Debit Card Total" = "Total Counted Deposit"
12. Once all above categories are complete, the Eskar employee will sign the bottom of the report and pass it along to the General Manager or Assistant Manager(s) to verify totals and inform the Eskar employee of their closing total from Leaf Logix. The Eskar employee will not know their recorded Leaf Logix closing deposit total until the General Manager or Assistant Manager(s) reviews their physical deposit.
13. The General Manager or Assistant Manager(s) will also go through the "End of Shift Cash Deposit" table and initial as they count and verify the totals to be the same that the Eskar employee indicated on their closing report. If there are no discrepancies, the General Manager or Assistant Manager(s) will sign off on all individual categories on the table, "Approved by."

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14. Once the total is communicated and any difference is established, the Manager will record the Leaf Logix amount on the "Leaf Logix Total" line.
15. If there is a discrepancy between the physical deposit (Cashless ATM receipts included) total versus the Leaf Logix total, it will be recorded on the "Difference (+/-)" line.
16. Once the totals are all finalized there will need to be two signatures present, "Eskar Employee Signature" is where the Eskar employee will sign off on their daily shift deposit. "Manager Approval Signature" is where the General Manager or Assistant Manager(s) will sign off on the deposit with any discrepancies investigated and recorded.
17. Eskar employee's are not required to take any actions on the Leaf Logix platform to close themselves out for the day. This is completed by the General Manager or Assistant Manager(s) once their deposit is verified.
18. These closing reports will be scanned together at the close of business. These will all be collected and saved together on the [REDACTED] for accounting and compliance purposes.

Comment [2]: TBD

#### 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

#### 8. DOCUMENT APPROVALS



Doc Number: ESK-DSP-AR-SOP-116

Effective Date: XX/XX/XXXX

Version: 1.0

Supersedes: Initial Release

## Cash Recording & Transporting Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's cash recording and transportation procedures.

### 2. SCOPE

This document will provide guidance on how to properly complete a Cash Deposit Form as well as outline the cash transportation procedures used between ESKAR employees and the Empréal.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-SEC-AR-SOP-500	Employee and Visitor Check-In Procedures
ESK-DSP-AR-FRM-XXX	Cash Deposit Record Form

Comment [1]: TBD

### 6. PROCEDURE

1. All cash transactions are recorded through Leaf Logix.
2. The total needs to be corresponding with the End of Day Sales Report from Leaf Logix each night at the close of business. If for any reason these totals do not match, the General Manager or Assistant Manager(s) is to open up an investigation to uncover the discrepancy.
3. To upload the End of Day Sales Report that will be used to verify the cash received during that business day, Eskar employees shall click:
  - a. Reports;
  - b. Closing Reports;

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- c. Select the date desired; and
  - d. Export.
4. View the totals for the business day including the total cash deposit.
5. Deposit bags can be collected from Northern Bank.
6. On the outside of the deposit bag, Eskar employees shall record:
  - a. Eskar Northbridge Dispensary;
  - b. The Date; and
  - c. The Total Monetary Amount.
7. On the Deposit Log, Eskar employees shall record:
  - a. The Date;
  - b. Adult-Use Deposit,
  - c. The Last Five Digits of the Deposit Bag Number (located near the bottom of the bag);
  - d. The total amount present in the deposit bag; and
  - e. The Eskar employees' Name/Signature. The column for "\_\_\_\_\_ signature" and "pick-up initials" will be completed upon pick-up by Empyreal and the General Manager or Assistant Manager(s) that is present.
8. Once the end of day deposit is collected and verified by the General Manager or Assistant Manager(s), they will place all currency into a deposit bag. All bills are to be organized by highest to lowest monetary value.
9. All cash being deposited will be recorded on the physical deposit bag, the deposit log as well as on a deposit slip.
  - a. The deposit slips come from Northern Bank which is the financial institution selected by Eskar.
10. Once all the bills and coins are organized into the deposit bag along with the completed deposit slip, the General Manager or Assistant Manager(s) will seal the top of the deposit bag.
11. There will be a Deposit Safe. This safe is specific to deposits only.
  - a. Eskar employees will use the front load depository to drop the deposit bag into the safe without having to open the safe door.
12. Once employees have completed the steps above, the deposits will remain inside of the drop safe until the Empyreal arrives to collect and take the deposit to Northern Bank. These pickups are pre-scheduled and will be  .
13. Upon arrival, an employee from Empyreal will check in as a Visitor (Please refer to *ESK-SEC-AR-SOP-500 Employee and Visitor Check-In Procedures*).
14. The General Manager or Assistant Manager(s) will accompany both the Eskar security guard and the Empyreal employee to collect the deposits from the Cash Deposit Safe within the Office.
15. The General Manager or Assistant Manager(s) will unlock the drop deposit safe and collect all deposits.
16. The General Manager or Assistant Manager(s) will review the deposit log to ensure all physical deposits match.

**Comment [2]:** Once a week? Twice a week?

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17. The General Manager or Assistant Manager(s) along with the Emyreal employee will sign off on each individual deposit collected on the corresponding deposit log.
18. Once all deposits are verified by both the General Manager or Assistant Manager(s) and the Emyreal employee, the General Manager or Assistant Manager(s) will add up the total monetary value that is being taken to Northern Bank and record it on the deposit log. Beneath the table to record individual daily deposits, there are four fields that need to be completed, including:
  - a. Date of Deposit Pick-Up;
  - b. Deposit Pick-Up Start Time;
  - c. Deposit Pick-Up End Time; and
  - d. Total Number of Cash Deposit Bags.
19. The Emyreal employee will also give the General Manager or Assistant Manager(s) a document to confirm the pick-up. It is called the "[REDACTED]".
20. The General Manager or Assistant Manager(s) will need to save this document and scan it together with the completed deposit log.
21. The Emyreal employee will sign out and leave with the deposits to transfer them to Northern Bank.
22. The General Manager or Assistant Manager(s) will then email the completed deposit log and transport manifest to Ownership and upload it to [REDACTED].
23. The General Manager or Assistant Manager(s) will ensure there is a new Cash Deposit Form, printed and ready to go for the next business day's deposit.
24. If any daily cash deposits or transactions need to be reviewed, all deposit documentation is saved and archived on-site for the necessary amount of time desired by the state of Massachusetts and is available for review by the Commission upon request. All transaction information is recorded through Leaf Logix and is also available for review by the Commission upon request.

Comment [3]: TBD

Comment [4]: TBD

## 25. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

## 26. DOCUMENT APPROVALS:

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**Doc Number:** ESK-DSP-AR-SOP-117  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Escorting From Premises Procedures SOP

### 1. PURPOSE

To ensure the proper procedures are enacted for escorting a consumer or loiterer out of Eskar's Dispensary and off Eskar's property.

### 2. SCOPE

The procedures listed within the document will cover specific scenarios where a consumer(s) may be asked to leave as well as the procedures for refusing service to a consumer(s) and escorting them out of the Dispensary.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
N/A	N/A

### 6. PROCEDURE

1. The General Manager and Assistant Manager(s) are responsible for handling situations where a consumer is asked to leave the Dispensary and property.
2. It is the General Manager and Assistant Manager(s)'s responsibility to defuse any negative situation that arises, if it is within reasonable circumstances.
3. If the safety of any Eskar employee is threatened, there is onsite security to monitor these circumstances within the Dispensary.



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4. If any consumer creates a security threat they will be asked to leave by Dispensary Management.
5. As an Eskar employee, if at any point a consumer speaks inappropriately or makes an Eskar employee uncomfortable with actions or words, threatens the safety of an Eskar employee, raises their voice, etc., inform the General Manager, Assistant Manager(s) and/or Security of the situation and they will be asked to take over the interaction/ transaction.
6. Once appropriate personnel arrive and take over the interaction, the Eskar employee(s) will excuse themselves from the situation if necessary and only if the situation deems safe to do so.
7. If a consumer raises their voice or begins to make threats/ inappropriate statements, the General Manager and/or Assistant Manager(s) have the right to deny service and ask them to leave the premises.
8. Consumers that arrive at the Dispensary that are clearly intoxicated or exhibiting erratic behavior, the Dispensary Management has the right to deny service and ask them to leave the premises.
9. The General Manager or Assistant Manager(s) will inform the Cannabis Control Commission and an Incident report will be created.

**10. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

**11. DOCUMENT APPROVALS:**





**Doc Number:** ESK-DSP-AR-SOP-118

**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

## Management & Employee Opening Procedures SOP

### 1. PURPOSE

To ensure proper opening procedures are being executed and maintained within Eskar's Dispensary by Management and all Eskar employees.

### 2. SCOPE

These procedures apply to all Eskar employees and will explain what are the opening responsibilities for Eskar Management and employees upon arrival for their scheduled shift.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-114	Retail Cash Bags Procedures
ESK-DSP-AR-SOP-109	Product Handling Procedures

### 6. PROCEDURE

1. When an Eskar employee arrives for their shift, they will press the call button at the employee entrance so that the Security Officer can verify that they are an active Eskar employee.
2. The Security Officer will unlock the door, which will allow the Eskar employees to enter into the Dispensary.

# ESKAR

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- a. When the Eskar employee enters, they must make sure the door closes and locks behind them, to avoid consumers accidentally walking into the Eskar employees' entrance or entering the facility outside of business hours.
3. At the start of a shift, Eskar employees will need to collect their ME Agent Badge from the Office.
  - a. Eskar employees must wear their ME Agent Badge at all times when present in limited access areas within the Dispensary.
4. Eskar employees will clock in using [REDACTED] on the tablet located [REDACTED].
  - a. Eskar employees must clock in on time for their scheduled shift. If they do not, they may face disciplinary action up to termination of employment.
5. Dispensary Management and Eskar employees will start the day by assisting in preparing and transferring marijuana products in the Vault onto the rolling storage rack.
6. Product storage carts will be wheeled out onto the sales floor by Eskar employees and will assist in setting up the sales floor backstock cabinets and drawers located behind the POS counter.
7. Eskar employees will communicate with each other regarding marijuana product placement to ensure that all team members are aware of where certain marijuana products are located. Eskar employees will ensure marijuana product categories are not mixed and are stored in designated areas of the storage cabinets.
  - a. All refrigerated items, including live concentrates and frozen edibles, should be placed in the refrigerators.
8. Eskar employees will then collect their designated cash bag from the General Manager or Assistant Manager(s) and set their station up on their assigned till station.
9. Eskar employees will ensure all computers (Showroom and Check-In Area) are turned on and open a tab for Leaf Logix, Eskar's Daily Menu, and Eskar's email account. Eskar employees should log in with their personal login information if required.
10. Eskar employees will verify they have all needed tools to begin their shift, including but not limited to:
  - a. Receipt paper;
  - b. Labels;
  - c. Adequate Change;
  - d. Counterfeit Pens;
  - e. Hand-Held Blacklight;
  - f. Shopping Bags, etc.
11. Eskar employees will turn on the blacklights and ID scanners at the Check-In Area.
12. Eskar employees will check-in with the General Manager and/or Assistant Manager(s) and obtain the menu for that specific day of business.
13. Eskar employees will verify overall shelf facing is updated, organized, and dusted and will continue to maintain shelf display integrity throughout the day.

**Comment [1]:** TBD

**Comment [2]:** TBD

**Comment [3]:** Possibly more items to be added to this list.



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**Doc Number:** ESK-DSP-AR-SOP-118

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**Version:** 1.0

**Supersedes:** Initial Release

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14. All Eskar employees will be required to attend the morning meeting. This is where the General Manager and/or Assistant Manager(s) goes over promotions, inventory and basic updates before beginning the business day.
15. All Eskar employees should be at their register with a cash drawer prepared and ready to help consumers at the time of their scheduled shift.

**16. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

**17. DOCUMENT APPROVALS:**



Doc Number: ESK-DSP-AR-SOP-119

Effective Date: XX/XX/XXXX

Version: 1.0

Supersedes: Initial Release

## Management & Employee Closing Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's Management and Eskar employee Dispensary closing procedure.

### 2. SCOPE

This policy explains the steps to properly run closing reports, Eskar employee duties and Metrc responsibilities at the end of day.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-115	Cash Drop & EOD Closing Procedures
ESK-DSP-AR-SOP-116	Cash Recording and Transport Procedures
TBD	Cash Drop and Dispensary Agent Closing Report

Comment [1]: Needs a Doc #.

### 6. PROCEDURE

#### Management Closing Procedures

When assisting Eskar employees in completing their cash drops, the General and/or Assistant Manager(s) shall:

1. Print a detailed report from all cashless ATM terminals.
  - a. Select the right-hand purple menu button along the top of the cashless ATM terminal screen, labeled "Reports."
  - b. Enter the managers password ( ) it is the same password for all cashless ATM terminals

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**Supersedes:** Initial Release

- c. Select the green button to move forward
  - d. Enter the date 2 times (MM/DD/YYYY) and then select the green button
  - e. Select the F2 button along the right hand side of the screen will print out the detailed report.
2. Write the name of the Eskar employee at the top of this printed cashless ATM report. Attach this printed "Detail Report" to the Eskar employees' stack of Leaf Logix receipts. All receipts need to be paper clipped together for Eskar employees.
3. Do not combine all receipts at the end of the night into a single stack. They need to go into a single envelope that's labeled with the Arlington Dispensary, the Date and Adult-Use Designation.
4. The total monetary value recorded on the cashless ATM "Detail Report" will reflect the amount that was accepted through the Cashless ATM machine. The total added up by the Eskar employee and their cashless ATM receipts should match the total on their End of Day Closing Report.
5. Print a copy of the End of Day Closing Report in Leaf Logix
  - a. Reports
  - b. Closing Reports
  - c. Select Date
  - d. Click "Run"
6. Upload the report into an email addressed to the Manager who is responsible for closing that day. Once the email is received, print the email so that it can be scanned in with all individual Dispensary Closing Report(s). These closing reports must be signed by both the Eskar employee and the Manager closing their register.
7. The General Manager or Assistant Managers(s) will countdown all Eskar employee's deposits and verify their totals are correct according to Leaf Logix reports.
8. Ensure all Eskar employees complete and sign their Cash Drop and Closing Report(s).
9. To collect an Eskar employee's Closing Report:
  - a. Reports
  - b. POS Dashboard
  - c. Eskar employees.
10. This will tell you the closing deposit for the Eskar employee.
11. Note this is their complete total, on most occasions the Eskar employee will have credit (cashless ATM) and cash transactions. The expected cash total can be viewed when closing out the Eskar employee's individual cash drawer.
12. To collect the Eskar employee's cash total, take the following steps in the backend of Leaf Logix:
  - a. POS
  - b. Daily Activities
  - c. Register Transactions
13. Locate the register in which the Eskar employee was conducting their transactions for the day. The total located at the top left-hand corner, is their daily cash total.
14. Close out each individual register on Leaf Logix and troubleshoot any monetary discrepancies. To close out a register:

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- a. POS
  - b. Daily Activities
  - c. Register Transactions
  - d. Locate the register in which the Eskar employee was conducting their transactions for the day
  - e. Select "Close Out"
15. In this window pop-up, there should be a \$0.00 balance to start, "Cash Income" will be their ending cash total for that day
16. Enter the amount of cash the Eskar employee collected and recorded on their closing sheet in the section "Cash Counted"
17. When the total "Cash Counted" is entered, the total should match up with the Eskar employee Closing Report (there is a designated line for the "Difference," that will list out and identify any monetary discrepancies)
18. Include the Eskar employee cashless ATM total in the "Note" section
19. Select "Close Out" to finish closing the register. Confirm to close the register.
20. If a discrepancy is identified with a Eskar employee's closing total, there are common errors that can occur. Some of these common examples include:
  - a. Verifying that an Eskar employee did or did not accidentally enter a cash transaction as a cashless ATM or vice versa. The cash total will not reflect their correct cash total if there was an entry error in Leaf Logix during a transaction. An easy way to determine this is if their debit total has change included, debit transactions will never have change included (they run in increments of \$5 and then the Eskar employee gives the difference in change back).
  - b. Another possibility is a change error, the Eskar employee may have incorrectly given change or incorrectly received payment.
  - c. Compare cashless ATM transactions from the detailed report print out to the physical credit card receipts they used to add up their total.
21. Once all cash and cashless ATM totals have been verified, the General Manager or Assistant Manager(s) will place the cash into a deposit bag. All cash needs to be combined at the close of business (as long as all individual deposits are accurate, do not combine if there needs to be investigations with any deposits).
22. The outside of the deposit bag needs to be labeled with the following information:
  - a. Name: Eskar Dispensary
  - b. Date of Deposit
  - c. Total monetary value present in the deposit bag for that days deposit
23. Organize the deposit by largest bills to smallest bills (100's, 50's, 20's, 10's, 5's, 2's, 1's, etc.).
24. Verify the seal deposit bag and place it into the deposit safe.
25. Record daily sales deposit on the Deposit Log inside of the Vault.
26. Recount the change safe if needed. This only needs to be done once per day by the General Manager or Assistant Manager(s).

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27. Verify all marijuana products have been placed back in the Vault.
28. Conduct a final Dispensary walk-through to verify all closing duties have been completed.
29. Turn off all lights, heaters, fans, and music.
30. Ensure that the dehumidifiers are on and located in the Dispensary Show Room.
31. The General Manager and Assistant Manager(s) shall update Eskar's Product Menu throughout the business day to ensure inventory levels and available product types are accurate
32. Product Menu will not be printed until the morning in case there are changes to the menu for the following day. The menu will be updated online throughout the day when product(s) are added or when product(s) sell out.
33. The General Manager or Assistant Manager(s) will scan in the printed End of Day Closing Report and all individual Eskar employee closing reports to [REDACTED].
34. Send the closing email – subject noted as “Eskar (Arlington) Closing (Date)” to:
  - a. Michael Hunnewell
  - b. Michael Aldi
  - c. TBD
  - d. TBD
  - e. TBD
35. Details for the email: Include the statement “Closing totals for Eskar (Arlington) (Date)”
  - a. Total Net Sales
  - b. Total New Customers
  - c. Total Customers
  - d. Highlight, copy and paste the “Closing Report” generated from Leaf Logix onto the email below the highlighted categories
  - e. Include the following exported reports from Leaf Logix:
    - i. **Static Reports**
      1. Report Type “Closing Reports”
      2. Select Report “Product Sales Report”
      3. State Date “Today’s Date” End Date “Today’s Date”
    - ii. **Static Reports**
      1. Report Type “Inventory Sales Transactions”
      2. Select Report “Inventory Report by Date by Sku”
      3. State Date “Today’s Date” End Date “Today’s Date”
    - iii. **Static Reports**
      1. Report Type “Inventory Sales Transactions”
      2. Select Report “Inventory Report by Date by Sku”
      3. State Date “Monday of that week” End Date “Today’s Date” (Sunday Only)
  - f. Include a spreadsheet with the current inventory:
    - i. Inventory,

**Comment [2]:** TBD

**Comment [3]:** Need to finalize all individuals that will want to review the EOD Closing Reports.

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- ii. View Inventory,
- iii. Export
- iv. To add these reports to the emails, select “export” from Leaf Logix, when the download populates at the bottom of the screen, select the option menu (arrow) from the file to select “show in folder,” from here you can drag and drop into either closing email.

#### **Finalizing Metrc Sales Procedures**

1. The General Manager or Assistant Manager(s) is responsible for finalizing Metrc Sales before business the following day.
  - a. Login to Metrc
  - b. Click the “Sales Tab”
  - c. Click “Receipts”
  - d. There is an option to finalize sales one by one and there is an option to finalize all sales as a group.
  - e. Finalizing sales one by one:
    - i. Select one of the sales you are attempting to finalize
    - ii. Select “Finalize”
    - iii. A pop-up will appear with the receipt number pre-entered
    - iv. Select “Finalize” again on this pop-up to complete the process
  - f. To finalize all sales as a group:
    - i. Select “Finalize All Sales.”
    - ii. A pop-up will appear with all of the receipt numbers pre-entered from that business day.
    - iii. Select “Finalize All Sales” again on this pop-up to complete the process.

#### **Security Closing Procedures**

1. The General Manager or Assistant Manager(s) will arm the Dispensary, wait to receive a message alert from the Virtual Keypad application confirming the alarm was set.
2. The General Manager or Assistant Manager(s) responsible for closing shall ensure all perimeter doors and closed and locked before leaving.





<b>Doc Number:</b> ESK-DSP-AR-SOP-119	<b>Effective Date:</b> XX/XX/XXXX
<b>Version:</b> 1.0	<b>Supersedes:</b> Initial Release

7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

8. DOCUMENT APPROVALS:



**Doc Number:** ESK-DSP-AR-SOP-120

**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

## Inventory Audit Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's procedures for conducting daily active inventory audits.

### 2. SCOPE

This procedure applies to all activities involving the movement and tracking of active and bulk marijuana product inventory within Eskar's Northbridge Dispensary and applies to all Eskar employees.

### 3. DEFINITIONS

N/A

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-COM-AR-SOP 700	Incident Reporting Procedures SOP
ESK-COM-AR-SOP 701	Monthly Product Inventory Procedures SOP
ESK-COM-AR-FRM-021	Audit Report Form

### 6. PROCEDURE

#### Audit Preparation Procedures

1. Prior to an audit, Eskar employee(s) will prepare a sheet to work off of when performing a product audit listing all items/locations that are going to be counted.
2. Eskar employees will sign into Leaf Logix.
3. Click the "Inventory" module, and select "View Inventory".

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4. Select the room(s) to be audited by clicking the appropriate room(s) in the "Room" dropdown menu atop the "View Inventory" screen.
5. Select the product categories to be audited by clicking the appropriate categories in the "Categories" dropdown menu atop the "View Inventory" screen.
6. Click the Export icon in the upper right hand portion of the "View Inventory" screen and select the following fields to export:
  - a. Product
  - b. Package ID
  - c. Category
  - d. Batch
  - e. Room
  - f. Available
  - g. External Package ID (Metric Tag#)
7. Click the "Export" button at the bottom of that selection window.
8. Eskar employees will then open a blank excel spreadsheet and select "Import" from the "File" dropdown menu, which will bring up a new window. From here, click the "Upload" tab and drag the file into the space provided.
9. When the spreadsheet has been uploaded, Eskar employees will sort the sheet A-Z by category.
10. Eskar employees will then set all row heights to 28.
11. Eskar employees will then click the "Format" dropdown menu and select "Alternating Colors"
12. Eskar employees will then print out the sheet, to be filled out by hand as counts are conducted.

#### **Active Daily Inventory Audit Procedures**

1. All active (Show Room) products are to be counted at a minimum of 2 days per week, every week.
2. All active (Show Room) products will also be counted at a minimum of once per month, on the final day of the month (Please refer to *ESKCOMAR-SOP 701 Monthly Product Inventory Procedures SOP*).
3. Eskar employees will count each product in the appropriate storage bins on the active Show Room carts and record the findings on the Audit Count Sheet. Eskar employees will move on to count the active backstock in the Vault.
4. Eskar employees will count each product in the appropriate storage bins in the active Show Room backstock and record the findings on the Audit Count Sheet.
5. Products are to be counted by hand in individual units according to the Product Name/ID and Metric Package Tag Number. Each individual unit is to be handled and counted one by one until each product in the bin has been handled.
6. Eskar employees must be careful about counting units one storage bin at a time.

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**Version:** 1.0

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**Supersedes:** Initial Release

7. When all items have been counted from both the active Show Room carts and active vault backstock, Audit Count Sheets will be compared against the Inventory records in the POS system.
8. If no discrepancies are found, Eskar employees will compile a final digital spreadsheet of the findings located in the [REDACTED], printed and signed by all parties that participated in conducting the audit. Eskar employees will save a digital copy to [REDACTED], and file one physical copy in the Office for record keeping.
9. If a discrepancy is identified, Eskar employees will return to the product in question and perform a recount and adjust the Audit Count Sheet with updated and accurate information in the situation of a miscount.
10. If products cannot be reconciled accordingly, an investigation will commence and inventory will be updated to reflect accurate quantities. The General Manager and/or Assistant Manager(s) will then be notified and an Incident Report will be generated.

**Comment [1]:** TBD

**Comment [2]:** TBD

## Daily Bulk Inventory Audit Procedures

Marijuana Product(s) will be counted according to certain categories each day (E.g. Flower, Concentrates/Oil/Cartridges, Edibles, Topicals/Tinctures). To begin a bulk audit, the Eskar employees shall:

1. Generate an Audit Sheet Form.
2. Products are to be counted by hand in individual units according to the product name and will be sorted on the Audit Sheet Form in ascending order by Product ID.
3. Locate the product in the Vault for that particular day's count.
4. Before counting each container, the Eskar employee will need to remove the designated audit sticker identifier from the previous audit conducted. Once the sticker identifier has been removed, Eskar employees shall begin counting items inside the product bin.
5. Once the Eskar employee has completed counting a bin, they will record the counted number in the designated column on the Audit Sheet Form.
6. Eskar employees will affix a new audit identifier sticker to the bin. Place the tape on the side facing outward next to the Metrc Package Tag.
7. The following information shall be recorded onto the audit identifier sticker:
  - a. Quantity,
  - b. Date Audited, and
  - c. Auditors Initials.
8. Return the container to the appropriate Vault shelving location upon completion.
9. Eskar employees will reconcile the audit sheets and compare against inventory records in Leaf Logix and Metrc.
10. If no discrepancies are found, Eskar employees will compile an Audit Report Form.
11. The Audit Report Form will be submitted to the General Manager or Assistant Manager(s).
  - a. One will be a digital copy.

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**Supersedes:** Initial Release

- b. One copy will be filed in the Office for record keeping purposes.
- 12. If a discrepancy is found, Eskar employees will return to the product in question and perform a recount and adjust the Audit Sheet Form.
- 13. If the product reconciles properly after the recount, then no further steps are necessary and only the Audit Report Form needs to be completed.
- 14. If the product cannot be reconciled accordingly, an investigation will commence and an Incident Report will be generated.

**7. REVISION HISTORY:**

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

**8. DOCUMENT APPROVALS:**



**Doc Number:** ESK-DSP-AR-SOP-X121  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Product Receiving Procedures SOP

### 1. PURPOSE

To ensure proper understanding of Eskar's physical marijuana product receiving procedures.

### 2. SCOPE

This document outlines the process for receiving digital inventory from a 3rd-party licensed entity as well as the physical processes of receiving marijuana product(s) via a delivery drop-off.

### 3. DEFINITIONS

**Transfer** - Means the sale of Marijuana or Marijuana Products from a Marijuana Establishment to a separate Marijuana Establishment, Independent Testing Laboratory or MTC (but not to Consumers) subject to entry of the transaction in the Commission's Seed-to-sale SOR.

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-122	Transport/Outbound Manifest Procedures
ESK-DSP-AR-SOP-123	Retail Metrc Procedures

### 6. PROCEDURE

#### Physical Product Receiving Procedures

1. When a delivery is scheduled to come in, the originating 3rd-party licensed entity will email a digital copy of the Transport Transport Manifest to be delivered prior to delivery.
2. Eskar employees will ensure the entire duration of all deliveries are under clear surveillance review and that the area in which the marijuana product(s) will be verified are clean and sanitary.



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**Supersedes:** Initial Release

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3. Eskar will require the transporting ME or MTC Agent(s) to inform Eskar's General Manager or Assistant Manager(s) of their departure from the originating location.
4. Eskar will require the transporting ME or MTC Agent(s) to inform Eskar's General Manager or Assistant Manager(s) of their arrival to Eskar Dispensary.
5. All delivery vehicles will be directed to the Rear Entrance/Exit in the back of Eskar's Dispensary. All containers containing marijuana product(s) will be brought in through the Rear Entrance/Exit and into the Packaging Work Area located right outside the Vault. All movement and verification of product will include supervision from a Security Officer.
6. Upon arrival, the transporting ME or MTC Agent(s) will be checked in as a Visitor (Please refer to *ESK-SEC-AR-SOP-500 Employee and Visitor Check-In Procedures*) and be assigned an escort to conduct the delivery.
7. The transporting ME or MTC Agent(s) will present a physical copy of the Transport Transport Manifest to the Eskar Receiving Team after marking the Date and Time of arrival on the Transport Manifest (Please refer to *ESK-DSP-AR-SOP-122 Transport/Outbound Transport Manifest Procedures*).
8. The Eskar Receiving Team will review the physical Transport Manifest to ensure it matches up with the digital copy that was sent and all required information has been input by the transporting ME or MTC Agent(s) (Please refer to *ESK-DSP-AR-SOP-122 Transport/Outbound Transport Manifest Procedures*).
9. Upon confirmation of Transport Manifest accuracy, Eskar's Receiving Team will begin the receiving verification process, including:
  - a. Breaking the seal on the outer delivery container.
  - b. Remove one unit within the container.
  - c. Review the outer label on the packaged unit to ensure the description matches the Transport Manifest description.
  - d. All labeling, product information, and testing information for each product type included on the Transport Manifest will be reviewed to confirm compliance and accuracy of information.
  - e. Eskar employees will physically handle and count each item contained within the container to confirm quantities listed on the Transport Manifest.
  - f. If quantities are accurate, Eskar employees will move on to the next packing container and continue the same process for all remaining containers/product types.
10. When the verification process is complete, the General Manager or Assistant Manager(s) will fill in their name in the "Name of Person Receiving or Rejecting Product" portion of the Transport Manifest.
11. The General Manager or Assistant Manager(s) will sign their name in the "Signature" portion of the Transport Manifest, and fill in the date in the adjacent "Date" portion of the Transport Manifest.



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12. The General Manager or Assistant Manager(s) will make two copies of the completed Transport Manifest to be kept on hand at the Dispensary for record keeping purposes.
13. The General Manager or Assistant Manager(s) will return the completed original copy of the Transport Manifest to the transporting ME or MTC Agent(s).

#### **Digital Product Receiving Procedures**

1. After the physical receipt of marijuana product(s) is complete, the General Manager or Assistant Manager(s) will log into Leaf Logix and select the "Inventory Tab."
2. Select "Receive" to receive the product digitally into the POS software (Leaf Logix).
3. The General Manager or Assistant Manager(s) will need to digitally input all marijuana product types within the order into Leaf Logix.
4. Select the "Vendor Tab" from the drop down list within the Receiving module.
5. Enter the names of the Transporting Agent(s) in the "Delivered By" field.
6. Enter the License Number of the originating entity in the "Vendor License # Tab."
7. The General Manager or Assistant Manager(s) will assign an appropriate name (E.g. Eskar Wholesale Delivery – XX/XX/XXXX) for the order in the "Order Title" field.
8. The General Manager or Assistant Manager(s) will enter the date and time of arrival in the "Delivered On" field.
9. The General Manager or Assistant Manager(s) will enter the exact same information from the "Order Title" field into the "Transaction ID" field.
10. The General Manager or Assistant Manager(s) will select where the inventory will populate by making the appropriate selection in the "Room" drop down menu.
11. The General Manager or Assistant Manager(s) will select "NO" from the "Print Labels" drop down menu.
12. The General Manager or Assistant Manager(s) will begin entering individual product information contained in the delivery.
13. The General Manager or Assistant Manager(s) will click the "Add" button, bringing up the "Receiving Details" window. This is where all of the details regarding specific marijuana products will be entered.
14. The General Manager or Assistant Manager(s) will enter the following product information in the designated fields:
15. Product Name;
  - a. Type/Category;
  - b. Quantity;
  - c. Flower Equivalent;
  - d. Vendor;
  - e. Room;
  - f. Package ID Number;
  - g. Batch Number;





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**Version:** 1.0

**Supersedes:** Initial Release

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- h. Cost Per Unit (Wholesale);
  - i. Price Per Unit (MSRP); and
  - j. Expiration Date.
16. The General Manager or Assistant Manager(s) will review this information to verify accuracy. When confirmed, click “OK” and the marijuana product(s) will be added to the list of items to be received.
17. Click the “Receive” button. Leaf Logix will then bring these items into the digital tracking system and will display a green message box in the upper right hand corner saying “X (number of) products received.”
18. The General Manager or Assistant Manager(s) will then file a copy of the received Transport Manifest in the Office for record keeping.

#### 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

#### 8. DOCUMENT APPROVALS:



**Doc Number:** ESK-DSP-AR-SOP-122  
**Version:** 1.0

**Effective Date:** XX/XX/XXXX  
**Supersedes:** Initial Release

## Transport Manifest Procedures SOP

### 1. PURPOSE

The purpose of the Metrc Procedures document is to outline all areas in which Metrc is required and to provide step-by-step instructions for each Metrc process.

### 2. SCOPE

This document will provide information around Transport Manifests, Deducting Green Waste, Creating Item Procedures, Creating Packages from Packages, Sales Tab,

### 3. DEFINITIONS

**Transfer** - means the sale of Marijuana or Marijuana Products from a Marijuana Establishment to a separate Marijuana Establishment, Independent Testing Laboratory or MTC (but not to Consumers) subject to entry of the transaction in the Commission's Seed-to-sale SOR.

**Seed-to-sale Electronic Tracking System** - means a system designated by the Commission as the system of record (Seed-to-sale SOR) or a secondary electronic tracking system used by a Marijuana Establishment or an MTC or an Independent Testing Laboratory.

### 4. RESPONSIBILITIES

Directors, Managers, and Security Officers are responsible for ensuring this Standard Operating Procedure (SOP) remain up to date with Eskar's Quality Planning Objectives, and regulatory expectations of the following state agencies:

- 1.1. Cannabis Control Commission (CCC)
- 1.2. Massachusetts Department of Public Health (DPH)
- 1.3. OSHA
- 1.4. Local Law Enforcement

### 5. ASSOCIATED PROCEDURES

Doc. #	Title
ESK-DSP-AR-SOP-121	Product Receiving Procedures
ESK-DSP-AR-SOP-120	Inventory Audit Procedures

### 6. PROCEDURE



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**Doc Number:** ESK-DSP-AR-SOP-122

**Effective Date:** XX/XX/XXXX

**Version:** 1.0

**Supersedes:** Initial Release

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### **Metrc Procedures**

Metrc is the standard computer program used to track the movement of all regulated products from seed to sale, throughout the Massachusetts marijuana industry. Metrc is used to facilitate the sale and transfer of regulated products from the Grower to the Processor or Retail stores. All employees are required by Eskar to participate in both Metrc training webinars (New Business & Advanced) prior to using Metrc.

### **Transport Manifest Procedures**

All marijuana product(s) will be delivered by licensed 3rd-party entities. All marijuana product(s) will be identified via a Transport Manifest. When accepting an incoming Transport Manifest, the General Manager or Assistant Manager(s) shall:

1. Review the entire Transport Manifest during a delivery and ensure all necessary categories have been completed.
2. Categories within the Transport Manifest include:
  - a. Departure Date and Time of Departure.
  - b. Name, Address, and License Number of the originating cannabis establishment.
  - c. Name, Address, and License Number of Eskar.
  - d. Product Name and Quantities (by weight or unit) of each marijuana product.
  - e. All Sales Package Tag RFID Tags listed on the Transport Manifest should match to the ones physically present.
  - f. Arrival Date and Estimated Time of Arrival.
  - g. Make, Model and License Plate Number of Delivery Vehicle.
  - h. The exact route from the licensed facility delivering the cannabis product to Eskar.

### How to View a Transport Manifest in Metrc

1. To review a Transport Manifest in Metrc:
  - a. Log into Metrc.
  - b. Click the "Transfers Tab" and "Licensed Tab."
  - c. Click the "Incoming Tab."
  - d. Find the appropriate Transport Manifest and click on it (should then be highlighted in orange).
  - e. Click "View Manifest."
2. You can print out the Transport Manifest by clicking on the printer icon on the top of the farthest column to the right side of the monitor. You will have the option to print out the document in Excel or PDF format.

### Receiving a Transfer Manifest in Metrc

1. After the General Manager or Assistant Manager(s) has thoroughly inspected the marijuana product(s) being delivered, they will then need to complete and sign both copies of the physical Transport Manifest:
  - a. Date/Time Received;
  - b. Signature of Person Transporting;
  - c. Name of Person Receiving or Rejecting the Product;



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**Version:** 1.0

**Supersedes:** Initial Release

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- d. Confirmation Signature & Date; and
  - e. Signature of Individual Taking Receipt of Rejected Portion of this Shipment (Only if a Transport Manifest or a Package within a Transport Manifest if rejected).
2. Once all required areas of the Transport Manifest have been signed and filled out, the General Manager or Assistant Manager(s) will receive the Transport Manifest in Metrc. In order to receive a Transport Manifest, the General Manager or Assistant Manager(s) shall:
  - a. Log into Metrc.
  - b. Click on the “Transfers Tab.”
  - c. Click on the “Incoming Tab.”
  - d. Find the appropriate Transport Manifest and click on it (should then be highlighted in orange).
  - e. Click “Receive.”
  - f. A “Receive Licensed Transfer Box” will appear with all the Sales Package RFID Tags associated with the Transport Manifest.
  - g. The General Manager or Assistant Manager(s) will need to weigh out 5% of all packages and verify the total weight for each control sample for each Sales Package RFID Tag containing flower products.
  - h. Eskar employees will verify and count all units contained within each Metrc Package ID Tag.
  - i. Once all RFID Sales Package Tags and weights have been confirmed, the General Manager or Assistant Manager(s) will need to input the actual weight (Receive Quantity) or total quantities of units contained within the RFID Sales Package Tags. If the physical weight or quantity count is slightly different than what was originally inputted into Metrc, please record the actual physical weight under the “Receive Quantity” section.
  - j. The General Manager or Assistant Manager(s) will input the wholesale pricing for each package underneath the “Whsle Price” section.”
  - k. A package must be received completely. The system doesn’t allow for a partial package to be received.
  - l. Once all weights for each Sales Package RFID Tag are inputted, click “Receive Transfer.”
3. All the Sales Package RFID Tags will then be transferred to the “Active Packages” section in Metrc.

#### Rejecting a Transfer Manifest in Metrc

After the General Manager or Assistant Manager(s) has thoroughly inspected the marijuana product(s) being delivered, they will then need to receive or reject the Transport Manifest in Metrc. A Transport Manifest can be rejected by package or can be rejected completely (all packages included in the Transport Manifest). A rejected package will require the originating Licensee to receive the package back



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**Supersedes:** Initial Release

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into their custody (their Metrc Account). To reject an entire Transport Manifest or specific package(s) within the Transport Manifest, the General Manager or Assistant Manager(s) shall:

1. Log into Metrc.
2. Click on the “Transfers Tab.”
3. Click on the “Incoming Tab.”
4. Find the appropriate Transport Manifest and click on it (should then be highlighted in orange).
5. Click “Receive.”
6. A “Receive Licensed Transfers Box” will appear with all the Sales Package RFID Tags associated with the Transport Manifest.
7. To reject all packages included in the Transport Manifest, click the “Reject Package” box associated with all packages included in the Transport Manifest.
8. To reject a specific package(s), click the “Reject Package” box next to each package that applies.
9. Once all the “Reject Package” boxes have been clicked, the General Manager or Assistant Manager(s) will click the “Reject Reason” tab. This tab will provide a dropdown box with different reasoning as to why the individual package is being rejected.
  - a. E.g. Drying, During Transfer, Entry Error, Scale Variance, Spoilage, Theft, and Waste.
10. The General Manager or Assistant Manager(s) will then be required to fill in the “Notes” section to add in a customized reason as to why the package is being rejected.
11. Once all the “Rejected Boxes” have been selected for all appropriate RFID Sales Package Tags, click the “Receive Transfers” tab on the bottom.
12. All rejected packages will then be sent back to the originating licensee.
13. If you have any questions or concerns regarding any package within a Transport Manifest, you should reject it.

### **Item Creation Procedures**

Items will need to be created within the Administrative Tab in Metrc in order to describe all the different marijuana products and their respective strains that Eskar sells at their Dispensary. Items will be identified when receiving deliveries containing Metrc RFID Sales Package Tags for individual product types. Eskar employees will also use Items when creating new RFID Sales Package Tags. When assigning an Item, the General Manager or Assistant Manager(s) shall:

1. Log into Metrc.
2. Click the “Admin Tab.”
3. Click “Items.”
4. Input the correct Item naming convention (Naming Convention must be identical to the one in Leaf Logix).
5. There are eighteen different types of “Item Categories” to choose from. Eskar employees will use the following item categories:
  - a. Buds;
  - b. Concentrate (Each);
  - c. Infused (Edible);

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- d. Infused (Non-Edible);
  - e. Infused Beverage;
  - f. Infused Pre-Rolls;
  - g. Kief;
  - h. Raw Pre-Rolls;
  - i. Seeds;
  - j. Shake/Trim;
  - k. Suppository; and
  - l. Vape Product.
6. Fill out all required fields for the product category selected. All product categories will not have identical required fields.
  7. Click “Create Items.”

The screenshot shows the 'Add Items' form with a dropdown menu open for the 'Category' field. The dropdown lists the following categories: Buds, Concentrate, Concentrate (Bulk), Concentrate (Each), Immature Plants, Infused (edible), Infused (non-edible), Infused Beverage, Infused Beverages (Bulk), Infused Pre-Rolls, Kief, Raw Pre-Rolls, Seeds, Shake/Trim, Shake/Trim (by strain), Suppository, Vape Product, and Waste. The form also includes fields for Name, Unit of Measure, Product Photo, Label Photo, and Packaging Photo, each with a 'Select files...' button. There are also quantity input fields with '+' and '-' buttons. At the bottom, there are 'Create Items' and 'Cancel' buttons.

## Creating Package Procedures

When creating new RFID Sales Package Tags from an active Metrc Package Tag, the General Manager or Assistant Manager shall:

1. Log into Metrc.
2. Click the “Packages Tab.”
3. Identify and click the active RFID Sales Package Tag in which marijuana product(s) will be removed from.
4. Click “New Packages.”
5. Fill out all required fields within the "New Packages" window:
  - a. Verify that the “Package #1” is the correct RFID Sales Package Tag being combined into the new RFID Sales Package Tag.
  - b. Select the correct “Location” in which the new Package Tag will be stored.
  - c. Select the correct “Item” for the product being packaged.



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- d. The “Quantity” section underneath “Package #1” should have the total amount of marijuana product (weight or unit based depending on the product category) being taken from the Parent RFID Sales Package Tag. Total quantity should match the total weight or units assigned to the new RFID Sales Package Tag.
  - e. Under the "New Tag" tab, type in the last five digits of the new RFID Sales Package Tag being assigned.
  - f. Implement a note under the “Notes” section.
  - g. Click "Today" under "Package Date."
  - h. Do not click “Production Batch.”
6. Once all information has been verified, click “Create Packages.”
  7. The new RFID Sales Package Tag will then be available under the “Active Packages Tab.”

*\*Never combine different marijuana product(s) under a single RFID Sales Package Tag.*

*\*Never combine two of the same type of marijuana products, but from different Harvest or Production Batches.*

### **Sales Tab**

All transactions completed in Leaf Logix will be reflected in Eskar’s Metrc account in real time. Leaf Logix will push completed transactions through every fifteen minutes via API integration. The Sales Tab will be limited to the General Manager and Assistant Manager(s) only.

1. Log into Metrc.
2. Click the “Sales Tab.”
3. The General Manager and Assistant Manager(s) will have the capability to:
  - a. View Active/Inactive Sales;
  - b. Manually Record Receipts;
  - c. Edit Receipts; and
  - d. Finalize Receipts.

### **Metrc Product Adjustment Procedures**

The General Manager, Assistant Manager(s), or designated Eskar employees will be responsible for deducting green waste. Waste can be deducted in Metrc by adjusting pre-packaged units or bulk flower. When deducting green waste from a flower and/or pre-packaged unit, the General or Assistant Manager will:

1. Log into Metrc.
2. Go to the “Packages Tab.”
3. Click the appropriate RFID Sales Package Tag in which waste needs to be deducted.
4. After highlighting the appropriate RFID Sales Package Tag, click the “Adjust” tab.
5. Verify the correct RFID Sales Package Tag is under the “Package” section.
6. Verify the current quantity is correct under the “Quantity” section.
7. Choose to adjust the waste via the “Adj Quantity” or “New Quantity”

# ESKAR

**Doc Number:** ESK-DSP-AR-SOP-122

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- a. **Adj Quantity:** +/- the total amount which will be added or deducted (for waste it will always be deducted). Once the total quantity being adjusted is inputted, the “New Quantity” section will automatically populate to the new total weight.
  - b. **New Quantity:** The “Adj Quantity” section may be skipped, and the new total weight may simply be inputted under this section. This new total will adjust the correct amount of weight from the RFID Sales Package Tag.
8. Provide the reason for the adjustment.
  9. Provide a personalized reason for the adjustment. **This field MUST be filled out.**
  10. Provide the date in which the green waste will be discarded.
  11. Click “Adjust Packages.”
  12. Once all weight has been deducted from a specific Metrc Sales Package Tag, the General Manager or Assistant Manager(s) will finish the RFID Sales Package Tag in Metrc.
  13. Go to “Packages Tab.”
  14. Click Correct RFID Sales Package Tag.
  15. Verify that the package has “0” under “Quantity.”
  16. Click the “Finish” tab.

## 7. REVISION HISTORY:

Author	Revision Description	Version	Effective Date
TBD	Initial Release	1.0	XX/XX/XXXX

## 8. DOCUMENT APPROVALS





## Town of Arlington, Massachusetts

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### Tobacco Violations - Galaxy Market

#### ATTACHMENTS:

	Type	File Name	Description
▣	Reference Material	Galaxy_BOH_Memo_7-21-2021.pdf	Galaxy BOH Memo
▣	Reference Material	Galaxy_Market_12-4-2020.pdf	Correction Order 12042020
▣	Reference Material	Correction_Order_Galaxy_6-9-2021.pdf	Correction Order 06092021
▣	Reference Material	Correction_Order_Galaxy_6-22-2021.pdf	Correction Order 06222021



**Town of Arlington**  
**Department of Health and Human Services**  
**Office of the Board of Health**  
27 Maple Street  
Arlington, MA 02476

Tel: (781) 316-3170  
Fax: (781) 316-3175

**MEMORANDUM**

To: Board of Health  
From: Pdraig Martin, Lead Health Compliance Officer  
Date: July 15, 2021  
RE: Galaxy Market Tobacco Compliance Violations

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Kevin Sweet, TSG Consulting, conducted tobacco compliance checks on behalf of the department at several permitted retail tobacco establishments in town on June 9, 2021. Galaxy Market sold a package of Marlboro cigarettes to an underage individual at approximately 6:54 PM. This violation represents the second violation within a 36-month period.

In response to a complaint received regarding the sale of flavored products to minors, Pdraig Martin, Lead Health Compliance Officer, and Annette Curbow, Health Compliance Officer, conducted an inspection of Galaxy Market on June 22, 2021 at approximately 9:15 AM. Multiple flavored tobacco products were observed under the counter at the time of the inspection. These products included menthol and fruit flavored electronic nicotine delivery products. This violation represents the third violation within a 36-month period.

Prior to these violations, Galaxy Market was issued a correction order as a result of an inspection conducted by our department on December 1, 2020. Multiple flavored tobacco products were observed under the counter at the time of this inspection. These products included menthol cigarettes, menthol cigarette filter tubes, vanilla flavored cigarillos, and menthol flavored cigarillos.

The above actions are in violation of state law entitled "An Act to Modernize Tobacco Control", 105 CMR 665.00: Minimum standards for retail sale of tobacco and electronic nicotine delivery systems and of the Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products.

According to the Town's REGULATION RESTRICTING THE SALE OF TOBACCO PRODUCTS AND NICOTINE DELIVERY PRODUCTS,

"The violator shall receive:

- a) In the case of a first violation, a fine of one thousand dollars (\$1000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for seven (7) consecutive business days.
- b) In the case of a second violation within 36 months of the date of the current violation, a fine of two thousand dollars (\$2000.00) and the Tobacco and Nicotine

Delivery Product Sales Permit shall be suspended for fourteen (14) consecutive business days.

c) In the case of three or more violations within a 36 month period, a fine of five thousand dollars (\$5000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for thirty (30) consecutive business days”

In addition to the above violations, our department was notified that the Massachusetts Department of Revenue conducted an inspection of the above referenced location on February 11, 2021 in which multiple violations were noted.

Galaxy has served two previous seven-day (7-day) suspensions ordered by the Board of Health. The first was issued in February 2012 and the second in April 2017.

Enclosed please find the following items:

1. Copy of the correction order dated 12/4/2020
2. Copy of the correction order dated 6/18/2021
3. Copy of the correction order dated 6/23/2021



Town of Arlington  
Department of Health and Human Services  
Office of the Board of Health  
27 Maple Street  
Arlington, MA 02476

Tel: (781) 316-3170  
Fax: (781) 316-3175

## Correction Order

December 4, 2020

**HAND DELIVERED**

Galaxy Market  
Attn: Shajid Shaikh  
1348 Massachusetts Avenue  
Arlington, MA 02476

Please be advised that on December 1, 2020, at approximately 11:15 AM, the Arlington Board of Health conducted an inspection of your establishment after receiving a complaint regarding the sale of menthol tobacco products. Multiple flavored tobacco products were observed behind the counter at the time of inspection. These products included menthol cigarettes, menthol cigarette filter tubes, vanilla flavored cigarillos, and menthol flavored cigarillos.

Galaxy Market violated the state law entitled "An Act to Modernize Tobacco Control" and 105 CMR 665.000 by:

- ☐ Sale of tobacco product to a person under the Minimum Legal Sales Age;
- ☐ Sale of a flavored nicotine delivery tobacco product [flavored combustible and other traditional tobacco products are prohibited on and after June 1, 2020];
- ☒ **Offered for sale a flavored nicotine delivery product [see above];**
- ☐ Failure of a non-age restricted establishment to maintain a record from the manufacturer indicating that an unflavored nicotine delivery product has a nicotine content of 35 milligrams per milliliter or less;
- ☐ Other, see the below additional violations, with any necessary additional pages attached:

You are hereby ordered to comply with An Act to Modernize Tobacco Control and 105 CMR 665.000. In addition, the following fines and actions apply against Galaxy Market for violations of 105 CMR 665.000:

- ☒ **First violation: a fine of One Thousand (\$1,000.00) Dollars;**
- ☐ Second violation within a 36-month period from the first violation: a fine of Two Thousand (\$2,000.00) Dollars and a minimum of a 1 day suspension up to a 7 day suspension;

☐ Third violation within a 36-month period from the first violation or additional violations during that time period: a fine of Five Thousand (\$5,000.00) Dollars and a minimum of a 7 day suspension up to a 30 day suspension.

Consistent with 105 CMR 665.000, if this is a second, third or more violation within a 36-month period as indicated above, a **notice of the intent to suspend** the sale of tobacco products at or by **Galaxy Market** will follow forthwith.

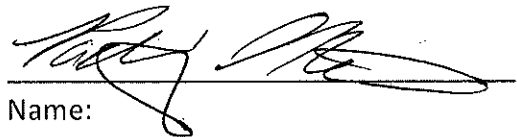
You are hereby ordered to pay the amount of **\$1,000.00** by check or money order made payable to the Town of Arlington within twenty-one (21) days of receipt of this order to the address below:

Arlington Board of Health  
27 Maple Street  
Arlington, MA 02476

If you are aggrieved by this order, you have the right to request a Hearing before the Board of Health. This request must be made by you, in writing, and filed within seven (7) days after the date this Order was served or actually received. Any affected party has a right to appear at said hearing.

Failure to comply with this order may result in additional penalties as permitted by law.

Signed by:

  
Name:

12/4/2020  
Date:

Padraig Martin, REHS  
Lead Health Compliance Officer  
Town of Arlington  
27 Maple Street  
Arlington, MA 02476



Town of Arlington  
Department of Health and Human Services  
Office of the Board of Health  
27 Maple Street  
Arlington, MA 02476

Tel: (781) 316-3170  
Fax: (781) 316-3175

## Correction Order

June 18, 2021

**HAND DELIVERED**

Galaxy Market  
Attn: Shajid Shaikh  
1348 Massachusetts Avenue  
Arlington, MA 02476

On Wednesday, June 9th, 2021, the Arlington Board of Health conducted a compliance check of several permitted retail tobacco vendors in town. Please be advised your establishment sold a package of Marlboro cigarettes to an underage individual at approximately 6:54 PM. This sale is in violation of 105 CMR 665.00: Minimum standards for retail sale of tobacco and electronic nicotine delivery systems and of the Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products.

Galaxy Market violated the state law entitled "An Act to Modernize Tobacco Control", 105 CMR 665.000, and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products by:

- ☒ **Sale of tobacco product to a person under the Minimum Legal Sales Age;**
- ☐ Sale of a flavored nicotine delivery tobacco product [flavored combustible and other traditional tobacco products are prohibited on and after June 1, 2020];
- ☐ Offered for sale a flavored nicotine delivery product [see above];
- ☐ Failure of a non-age restricted establishment to maintain a record from the manufacturer indicating that an unflavored nicotine delivery product has a nicotine content of 35 milligrams per milliliter or less;
- ☐ Other, see the below additional violations, with any necessary additional pages attached:

You are hereby ordered to comply with An Act to Modernize Tobacco Control, 105 CMR 665.000, and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products. In addition, the following fines and actions apply against Galaxy Market for violations of 105 CMR 665.000 and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products:

- ☐ First violation: a fine of one thousand dollars (\$1000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for seven (7) consecutive business days;
- ☒ **Second violation within a 36-month period from the first violation: a fine of two thousand dollars (\$2000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for fourteen (14) consecutive business days;**
- ☐ Third violation within a 36-month period from the first violation or additional violations during that time period: a fine of five thousand dollars (\$5000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for thirty (30) consecutive business days.

You are hereby ordered to pay the amount of **\$2,000.00** by check or money order made payable to the Town of Arlington within twenty-one (21) days of receipt of this order to the address below:

Arlington Board of Health  
27 Maple Street  
Arlington, MA 02476

You are hereby ordered to attend a Board of Health hearing on **Wednesday, July 21<sup>st</sup>, 2021 at 2:00 PM**. This hearing will be held to determine any further enforcement proceedings, including the possible suspension of your permit. The meeting will be conducted online via remote participation. A link to register for the meeting will be forthcoming.

Failure to comply with this order may result in additional penalties as permitted by law.

Signed by:

  
Name: \_\_\_\_\_

6/18/2021  
Date: \_\_\_\_\_

Padraig Martin, REHS  
Lead Health Compliance Officer  
Town of Arlington  
27 Maple Street  
Arlington, MA 02476



Town of Arlington  
Department of Health and Human Services  
Office of the Board of Health  
27 Maple Street  
Arlington, MA 02476

Tel: (781) 316-3170  
Fax: (781) 316-3175

## Correction Order

June 23, 2021

### HAND DELIVERED

Galaxy Market  
Attn: Shajid Shaikh  
1348 Massachusetts Avenue  
Arlington, MA 02476

Please be advised that on June 22, 2021, at approximately 9:15 AM, the Arlington Board of Health Conducted an inspection of your establishment after receiving a complaint regarding sale of flavored products to minors. Multiple flavored tobacco products were observed behind the counter at the time of the inspection. These products included menthol and fruit flavored electronic nicotine delivery products.

Galaxy Market violated the state law entitled "An Act to Modernize Tobacco Control", 105 CMR 665.000, and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products by:

- ☐ Sale of tobacco product to a person under the Minimum Legal Sales Age;
- ☐ Sale of a flavored nicotine delivery tobacco product [flavored combustible and other traditional tobacco products are prohibited on and after June 1, 2020];
- ☒ **Offered for sale a flavored nicotine delivery product [see above];**
- ☐ Failure of a non-age restricted establishment to maintain a record from the manufacturer indicating that an unflavored nicotine delivery product has a nicotine content of 35 milligrams per milliliter or less;
- ☐ Other, see the below additional violations, with any necessary additional pages attached:

You are hereby ordered to comply with An Act to Modernize Tobacco Control, 105 CMR 665.000, and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products. In addition, the following fines and actions apply against Galaxy Market for violations of 105 CMR 665.000 and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products:



- ☐ First violation: a fine of one thousand dollars (\$1000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for seven (7) consecutive business days;
- ☐ Second violation within a 36-month period from the first violation: a fine of two thousand dollars (\$2000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for fourteen (14) consecutive business days;
- ☒ **Third violation within a 36-month period from the first violation or additional violations during that time period: a fine of five thousand dollars (\$5000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for thirty (30) consecutive business days.**

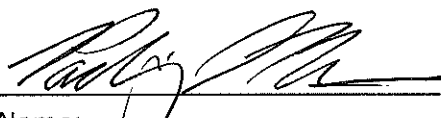
You are hereby ordered to pay the amount of **\$5,000.00** by check or money order made payable to the Town of Arlington within twenty-one (21) days of receipt of this order to the address below:

Arlington Board of Health  
27 Maple Street  
Arlington, MA 02476

You are hereby ordered to attend a Board of Health hearing on **Wednesday, July 21<sup>st</sup>, 2021 at 2:00 PM**. This hearing will be held to determine any further enforcement proceedings, including the possible suspension of your permit. The meeting will be conducted online via remote participation. A link to register for the meeting will be forthcoming.

Failure to comply with this order may result in additional penalties as permitted by law.

Signed by:

  
Name: \_\_\_\_\_

6/23/2021  
Date: \_\_\_\_\_

Padraig Martin, REHS  
Lead Health Compliance Officer  
Town of Arlington  
27 Maple Street  
Arlington, MA 02476



## Town of Arlington, Massachusetts

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### Tobacco Violation - Arlington Convenience

#### ATTACHMENTS:

	Type	File Name	Description
▢	Reference Material	Arlington_Convenience_BOH_Memo_7-21-2021.pdf	Arlington Convenience BOH Memo
▢	Reference Material	Correction_Order_Arlington_Convenience_6-9-2021.pdf	Correction Order 06092021



Town of Arlington  
Department of Health and Human Services  
Office of the Board of Health  
27 Maple Street  
Arlington, MA 02476

Tel: (781) 316-3170  
Fax: (781) 316-3175

**MEMORANDUM**

To: Board of Health  
From: Pdraig Martin, Lead Health Compliance Officer  
Date: July 15, 2021  
RE: Arlington Convenience Tobacco Compliance Violations

---

Kevin Sweet, TSG Consulting, conducted tobacco compliance checks on behalf of the department at several permitted retail tobacco establishments in town on June 9, 2021. Arlington Convenience sold a package of Marlboro cigarettes to an underage individual at approximately 6:12 PM. This violation represents the first violation within a 36-month period.

The above action is in violation of state law entitled "An Act to Modernize Tobacco Control", 105 CMR 665.00: Minimum standards for retail sale of tobacco and electronic nicotine delivery systems and of the Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products.

According to the Town's REGULATION RESTRICTING THE SALE OF TOBACCO PRODUCTS AND NICOTINE DELIVERY PRODUCTS,

"The violator shall receive:

- a) In the case of a first violation, a fine of one thousand dollars (\$1000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for seven (7) consecutive business days.
- b) In the case of a second violation within 36 months of the date of the current violation, a fine of two thousand dollars (\$2000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for fourteen (14) consecutive business days.
- c) In the case of three or more violations within a 36 month period, a fine of five thousand dollars (\$5000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for thirty (30) consecutive business days"

Enclosed please find the following item:

1. Copy of the correction order dated 6/18/2021



Town of Arlington  
Department of Health and Human Services  
Office of the Board of Health  
27 Maple Street  
Arlington, MA 02476

Tel: (781) 316-3170  
Fax: (781) 316-3175

## Correction Order

June 18, 2021

**HAND DELIVERED**

Arlington Convenience  
Attn: Davinder Sharma  
245 Massachusetts Avenue  
Arlington, MA 02474

On Wednesday, June 9th, 2021, the Arlington Board of Health conducted a compliance check of several permitted retail tobacco vendors in town. Please be advised your establishment sold a package of Marlboro cigarettes to an underage individual at approximately 6:12 PM. This sale is in violation of 105 CMR 665.00: Minimum standards for retail sale of tobacco and electronic nicotine delivery systems and of the Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products.

Arlington Convenience violated the state law entitled "An Act to Modernize Tobacco Control", 105 CMR 665.000, and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products by:

- ☒ **Sale of tobacco product to a person under the Minimum Legal Sales Age;**
- ☐ Sale of a flavored nicotine delivery tobacco product [flavored combustible and other traditional tobacco products are prohibited on and after June 1, 2020];
- ☐ Offered for sale a flavored nicotine delivery product [see above];
- ☐ Failure of a non-age restricted establishment to maintain a record from the manufacturer indicating that an unflavored nicotine delivery product has a nicotine content of 35 milligrams per milliliter or less;
- ☐ Other, see the below additional violations, with any necessary additional pages attached:

You are hereby ordered to comply with An Act to Modernize Tobacco Control, 105 CMR 665.000, and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products. In addition, the following fines and actions apply against Arlington Convenience for violations of 105 CMR 665.000 and Board of Health Regulation Restricting the Sale of Tobacco Products and Nicotine Delivery Products:

- ☒ **First violation: a fine of one thousand dollars (\$1000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for seven (7) consecutive business days;**
- ☐ Second violation within a 36-month period from the first violation: a fine of two thousand dollars (\$2000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for fourteen (14) consecutive business days;
- ☐ Third violation within a 36-month period from the first violation or additional violations during that time period: a fine of five thousand dollars (\$5000.00) and the Tobacco and Nicotine Delivery Product Sales Permit shall be suspended for thirty (30) consecutive business days.


You are hereby ordered to pay the amount of **\$1,000.00** by check or money order made payable to the Town of Arlington within twenty-one (21) days of receipt of this order to the address below:

Arlington Board of Health  
27 Maple Street  
Arlington, MA 02476

You are hereby ordered to attend a Board of Health hearing on **Wednesday, July 21<sup>st</sup>, 2021 at 2:00 PM**. This hearing will be held to determine any further enforcement proceedings, including the possible suspension of your permit. The meeting will be conducted online via remote participation. A link to register for the meeting will be forthcoming.

Failure to comply with this order may result in additional penalties as permitted by law.

Signed by:

  
Name:

  
Date:

Padraig Martin, REHS  
Lead Health Compliance Officer  
Town of Arlington  
27 Maple Street  
Arlington, MA 02476